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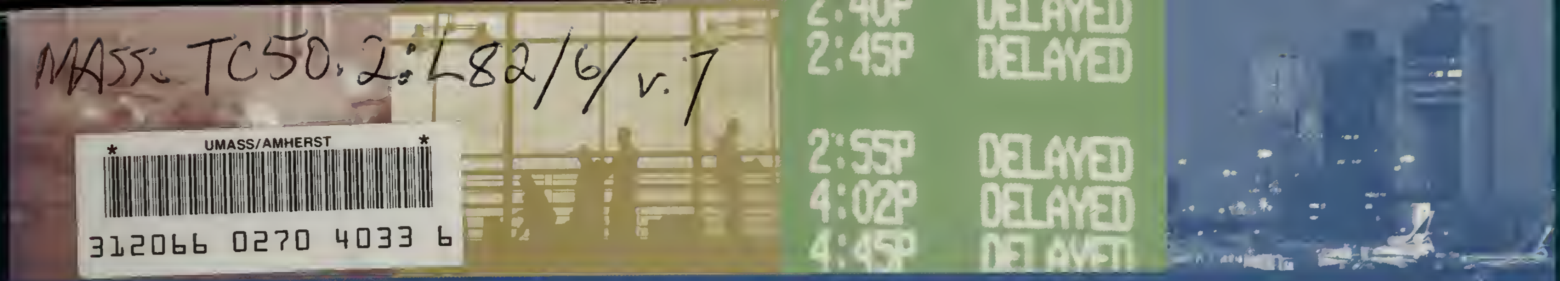

Supplemental Draft Environmental Impact Statement/Final Environmental Impact Report

EOEA #10458

Logan Airside Improvements Planning Project

Boston
Logan
International
Airport

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Federal Aviation Administration

Responses to Comments
Volume 7

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Acronyms

Airside Project	Logan Airside Improvements Planning Project
CAA	Clean Air Act
dB	decibel
DEP	Massachusetts Department of Environmental Protection
DOT	Department of Transportation
Draft EIS/EIR	Draft Environmental Impact Statement/Environmental Impact Report
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
ENF	Environmental Notification Form
EOEA	Executive Office of Environmental Affairs
EPA	Environmental Protection Agency
ESPR	Environmental Status and Progress Report
FAA	Federal Aviation Administration
FONSI	Finding of No Significant Impact
GEIR	Generic Environmental Impact Report
ILS	Instrument Landing Systems
INM	Integrated Noise Model
Logan Airport	Boston-Logan International Airport
Massport	Massachusetts Port Authority
MBTA	Massachusetts Bay Transportation Authority
MEPA	Massachusetts Environmental Policy Act
MESA	Massachusetts Endangered Species Act
MassHighway	Massachusetts Highway Department
MOU	Memorandum of Understanding
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OPSNET	FAA Air Traffic Operations Network
PM_{10}	particulate matter less than 10 microns in size
PPP	Peak Period Pricing
PRAS	Preferential Runway Advisory System
ROD	Record of Decision
SDEIS Panel	Supplemental Draft EIS Panel
Supplemental DEIS/ FEIR	Supplemental Draft Environmental Impact Statement/Final Environmental Impact Report
VFR	Visual Flight Rules
VOC	volatile organic compounds
29M Low Fleet	29 Million annual air passenger Low Fleet
37.5M High Fleet	37.5 Million annual air passenger High Fleet

LETTER 159

Duane Andrews, RN
85 Appleton Street #4
Boston, MA 02116
617-236-4890

Arthur Pugsley
Secretary of Environmental Affairs
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202
Attn. MEPA Office

April 15, 1999

Dear Mr. Pugsley,

I am writing to express my strong opposition to the proposed opening of Runway 1432 at Logan Airport and to the unfair and misleading tactics that I believe Massport is using to gain public support for the runway.

How Runway 1432 will harm my neighborhood:

I have been a resident of the South End of Boston for many years. It is a wonderful and historic landmark district neighborhood -- the largest existing collection of Victorian-era brick row-house architecture left in the United States. Unfortunately, it is also in the direct flight path of a large number of flights taking off from Logan Airport.

Runway 1432 will allow Massport to significantly expand the number of flights using the airport and will significantly increase the number of jets flying directly over my neighborhood according to Massport projections.

The current level of noise in the neighborhood is an incredible burden to all of us here. The jets begin at 6:00 am. They often can still be heard until at least 11:00 pm, sometimes later. When Massport is using the runway that targets the South End, the noise is continuous. It wakes us up, it rattles our windows, it makes roofdecks and gardens un-useable. Watching TV or talking to friends is interrupted every few minutes as another jet takes off. As an RN in a pediatric hospital, I am also well aware of the dramatic rise in rates of asthma in children (and adults) and of the suggested links between asthma and poor air quality.

My neighborhood will be significantly harmed by the increased noise and pollution that will result if Massport is allowed to go forward with Runway 1432 plans. 159.1

How I believe Massport is using unfair and misleading tactics to gain support:

Last night, I saw a commercial on TV touting the purported benefits of Runway 1432. A toll free number was provided for those desiring more information. The commercial was distressing in that it displayed Massport's apparent continued disdain and lack of concern for the neighborhoods which it impacts.

First, information was provided stating that the new runway would only be used for over-water take-offs, thus giving the false impression that Boston residents would not be adversely affected. No mention was made of the fact that the new runway's collateral effects would allow more intense use of the other existing runways, and would in fact, per Massport's own projections, double or even triple the number of flights over various neighborhoods in Boston. 159.2

In addition, when calling the toll free number, I was asked if I was aware that the new runway would reduce noise and air pollution over Boston. How can more-than-double the number of flights over my neighborhood decrease the noise and air pollution I am experiencing?

Finally, the commercial played on people's fears and frustrations related to the number of delays at Logan and the possible effect this could have on Boston tourism and business. In my opinion, these delays are overstated, as I understand Massport's statistics to include delays of less than 15 minutes (hardly a major inconvenience). Also, Massport did not point out that, while delays may be experienced, Logan Airport is one of very few airports in the country (world?) which can boast that it is located a mere 5 minute cab ride or 10 minute subway ride from the heart of the downtown business district. In most cities, you might always get in on time, but then you have an expensive, 45 minute ride to where you need to go. 159.3

Please consider what I have written. Please stop Runway 1432.

Sincerely,

Duane H. Andrews, RN

Letter 159
Duane Andrews, RN
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
159.1	Noise	Impacts	My neighborhood will be significantly harmed by the increased noise and pollution that will result if Massport is allowed to go forward with Runway 14/32 plans.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.
159.2	Environmental Review Process	Public Process	Massport's television ads give... the false impression that Boston would not be adversely affected. No mention was made of the fact that the new runway's collateral effects would allow more intense use of the other existing runways, and would in fact, per Massport's own projections, double or even triple the number of flights over various neighborhoods in Boston.	Massport did not sponsor television, radio, or newspaper advertisements. Projected changes in flight patterns and associated noise shifts are consistent with the PRAS goals, which were studied and approved by the community when established. Activity increases over certain communities are offset by activity reductions over other severely impacted communities and by activity increases over water.

Code	Topic 1	Topic 2	Comment	Response
159.3	Delay	Model	Massport overstates the levels of delay that occur at Logan.	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. Chapter 1 and Appendix C include a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport. The FAA Technical Center was responsible for the capacity and delay results in the 1992 FAA Capacity Enhancement Report for Logan Airport that concluded the need for Runway 14/32, reduced minimums and taxiway improvements. The Technical Center simulated Logan Airport airfield operations with the RDSIM model and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Airside Project Draft EIS/EIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates in 1992 with those of the Logan Airside Project estimates. The FAA has concluded that the Airside delays represent "a plausible and conservative estimate...." The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States Logan Airport's estimated annual delay hours are over five times the FAA's 20,000-hour threshold for a severely delayed airport.

LETTER 160

40 Union Park
Boston, MA 02118
April 12, 1999

Mr. John Rodman, Assistant Secretary
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

Subject: New Runway at Logan Airport

Dear Mr. Rodman:

I'm sending you this written testimony since I was unable to attend the public hearings last week.

The South End section of Boston is adversely affected by airplane noise. I have lived here over seven years and this year the noise level has increased dramatically. It starts at 6 am with a plane flying low overhead every minute, and it continues all day and part of the night.

If the new runway is built the number of flights over the South End and Roxbury will triple in ten years. Life here will become unbearable. The South End is a landmark district with just as much historic value as Concord and Uxbridge. It is an area that is undergoing an economic rebirth. Similarly, the Washington Street "Main Street" and Roxbury are both being redeveloped. But running a stream of low flying planes over these areas is going to ruin the quality of life in our neighborhoods, and damage property values as well. 160.1

Eventually the new runway will permit Massport to increase air traffic levels over ALL areas of the city. It is time to put a stop to this continual expansion, especially since Massport has no clear plan for the future. Alternative forms of transportation (especially trains) need to be developed and other airports promoted in order to keep Logan from growing like a cancer and destroying the city. 160.2

I ask the MEPA to not approve the new runway at Logan Airport.

Sincerely,

John Archibald

Letter 160
John Archibald
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
160.1	Noise	Impacts	...Washington Street "Main Street" and Roxbury are both being redeveloped. But running a stream of low flying planes over these areas is going to ruin the quality of life in our neighborhoods, and damage property values as well.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.
160.2	Regional Transportation	Passenger Rail/Regional Airports	Alternatives forms of transportation (especially trains) need to be developed and other airports promoted in order to keep Logan from growing like a cancer and destroying the city.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.

David A. Banta & Caroline E. Coggeshall
158 West Canton Street
Boston, MA 02118
(617)236-4637

March 30, 1999

LETTER 161

Governor Paul Cellucci
The State House
Office of the Governor, Room 360
Boston, MA 02133

Dear Governor Cellucci,

Massport's proposal to build Runway 14/32 is a slap in the face of all of Boston's neighborhoods and citizens. This runway will add capacity and inflict heavy noise on the majority of the city's inner neighborhoods, including East Boston, Charlestown, South Boston, Beacon Hill, Back Bay, Roxbury, Jamaica Plain as well as our own South End community.

For the past nineteen years, we have lived and raised our family in the South End, committed to the many benefits of being part of a diverse, caring inner city community. Over the last several years, our neighborhood has increasingly been on the flight path, which sends ear-deafening jets every couple of minutes over our home. As it currently stands, pilots often do not obey the noise abatement "corridor", and I was at a recent meeting where Massport and the FAA admitted that there is no way to enforce this corridor. If Runway 14/32 goes through, that traffic, and the noise pollution associated with it, will triple. 161.1

Massport claims that Runway 14/32 will help reduce delays at Logan. Yet they also admit that the proposed runway is a short-term solution, and that delays will return to their current levels by 2005, while the increase in noise pollution will be with us, the people of the City of Boston, forever. What, we ask, will be proposed in 2005?

It appears that Massport seeks to pit the Boston communities against each other, yet clearly this is a regional problem that demands regional solutions. Massport and the State Administration must look seriously at better utilizing existing airports in Providence, Worcester and Manchester, as well as Hanscom Field. Clearly, Boston needs a viable secondary airport that many American cities enjoy.

A long-time South Ender recently remarked "If there was ever a time for the people of Boston to stand up and shout, then this is that moment". As our Governor, you are in a position to help Boston's neighborhoods by opposing Runway 14/32. We hope that we, the people of Boston, can count on you.

Sincerely,

David A. Banta
Caroline E. Coggeshall

cc: Peter Blute, ✓Trudy Coxe

Letter 161
David A. Banta and Caroline E. Coggeshall
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
161.1	General Opposition			Comment noted.

LETTER 162

David Bartol
15 Dartmouth Place #3
Boston, MA 02116
February 16, 1999

MEPA Office
100 Cambridge Street
Boston, MA 02202

Dear Sir or Madam,

I have lived in the South End of Boston for about 10 years and find that the current noise from Logan Airport is a serious problem. In the summer when my windows are customarily open, it's sometimes impossible to hear an indoor conversation because of the airline noise! I have to sleep with a fan or air conditioner running when otherwise unnecessary, so as to provide "white noise" to drown-out the cacophonous noise from the jets overhead. And this is just the problem experienced indoors! Outdoors, it's even more disturbing. The existing situation is bad enough and I suppose I am resigned to it; however, the proposal to create a new runway, "14-32" is completely unacceptable.

I ask you to take whatever action possible to permanently stop the construction of runway 14-32! Thank you for your attention and efforts. 162.1

Yours Truly,

David Bartol

Letter 162
David Bartol
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
162.1	General Opposition		I ask you to take whatever action possible to permanently stop the construction of Runway 14/32!	Comment noted.

Claudia Brede
15 Blackwood Street ~~#4~~
Boston, MA-02115

LETTER 163

Arthur Pugsley
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202
ATTN: MEPA Office

Subject: Logan's expansion plans; EIS

Boston, April 20th 1999

Dear Arthur Pugsley,

Enclosed you can find the letter my husband and I sent a couple of weeks ago to the most important politicians and representatives of Massachusetts with regard to Logan's expansion plans and Massport's Environmental Impact Statement (EIS).

In addition to this letter I would like to mention following:

LOGAN'S IMPACT ON BOSTON:

- also Back Bay and Beacon Hill are already impacted of the noise caused by the use of Runway 27. An additional runway 14/32 will make it even worse !
- in Boston most planes do neither fly in the dictated flight height nor flight path
- the last couple of month the planes pass between 6.00 and 8.30 am approximately every 30 seconds the South End/Back Bay neighborhood

FAILINGS of MASSPORT'S NOISE ABATEMENT OFFICE:

- the last couple of weeks I have called the Logan's Noise Complaint Line again and again. Either I received different answers for the same questions and complaints or I haven't received my complaint report or nobody answered the phone
- until now I haven't received my requested personal copy of the EIS
- answers like "an airport is a bearable burden" are not acceptable !
- I also tried to get in contact with the acting Manager of Noise Abatement, Nancy Timmermann. She never returned my call (voice mail message)

BOSTON'S INTERNATIONAL APPROACH or what describes a world class city?:

- in most civilizedcountries planes are not allowed to fly over a highly populated area
- most countries have a night flight stop
- in most countries airports have been moved outside of the cities

These statements make clear that further expansion plans of Logan Airport are not acceptable. Boston's quality of life and reputation as a world class city will definitely suffer under a new runway.

I ask you to do all in your power to stop the construction of Runway 14/32. Massport also needs to investigate other equitable solutions for Runway 27. Vibrant, healthy communities are a major factor in Boston's reputation as a world class, people friendly area. Please do not allow Massport to destroy what the Bostonians have worked so hard to achieve.

Sincerely,

Claudia Brede

Claudia Brede

enc. 4

Claudia Brede
15 Blackwood Street #4
Boston, MA 02115

SENT TO:
Senator Edward M. Kennedy
Senator John F. Kerry
Congressman John Joseph Moakley
Congressman Michael Capuano
Senator Dianne Wilkerson
Senator Stephen F. Lynch
Representative Byron Rushing
Representative Gloria L. Fox
Representative Salvatore F. DiMasi
Governor Paul Cellucci
Mayor Thomas M. Menino
Councilor James M. Kelly
Councilor Thomas Keane

March 1999

Dear:

In 1997 my husband and I bought a Penthouse condominium next to the South-West Corridor. Until June 1998 we lived here in a peaceful and relatively quiet neighborhood, but since then we suffer from increasing noise generated by airplanes departing Logan Airport on Runway 27. This is has reached a level, that now even our 22month old daughter (normally a good and long sleeper) wakes up every morning between 6.00 and 7.00 am.

We understand that the Massachusetts Port Authority ("Massport") has recently filed for the environmental permits required to open a new runway, Runway 14/32, which they claim is needed to reduce delays at the airport. A byproduct of this delay reduction will be a 300% increase in airplane traffic over our home, bringing with it increased noise and air pollution. 163.1 Not to forget the possible damage to the very old buildings due to shaking vibration and sound waves. Not to mention the disastrous consequences, if a plane crashes in to our neighborhood.

In our opinion this is a short sighted solution to the delay problems at Logan. Massport's own analysis reveals that delays will return to current levels with five years of construction runway 14/32, and their claim of improved "spreading" of the noise associated with a 4% annual growth rate can not be substantiated. Indeed, the FAA tower has re-fused to be held to any agreement concerning noise abatement or mitigation measures.

As the noise levels are already unacceptable, any increase will cause a serious deterioration in the quality of life in our neighborhood as well as in a decrease of the value of our homes. 163.2

We ask you to do all in your power to stop the construction of Runway 14/32. Massport 163.3 needs to investigate alternatives such as peak hour pricing and the use of regional airports, such as Massport owned Hansom Airport in Bedford, before adding to our burden. 163.4

Vibrant, healthy communities are a major factor in Boston's reputation as a world class, people friendly area. Please do not allow Massport to destroy what the Bostonians have worked so hard to achieve.

Sincerely,

Claudia Brede

→ ☎ 4282800

☎ 617/5673333

MASSACHUSETTS PORT AUTHORITY
Noise Abatement Office
Boston-Logan International Airport
East Boston, MA 02128-2042

Aircraft Disturbance Report

Person Reporting Disturbance:

Mr. Claudia Brede
15 Blackwood St.
Boston, MA 02115

Telephone:

Disturbance Date and Time: 11:07 on 03 Aug 98 to 11:07 on 03 Aug 98

Conditions:

Wind Direction:	0 deg	**Wind Speed:**	6 Knots
Ceiling:	5500 Ft	**Visibility:**	10.0 Miles

Runways in Use:

Arrivals: 27 - 22L
Departures: 22R - 22L

Complaint Description: Last Saturday at 6:15 am the planes were coming over in 3 minute intervals. It was the same situation today at 6:15 am. It was also like this Saturday night at 11:00 pm. It is getting worse and worse.

Massport Report of Investigation: You are affected by departures from Logan's Runway 22. The FAA has been notified of your concerns by copy of this complaint.

Massport Reporter: Noise Abatement Office

Send Copy: Yes

cc: FAA Boston Tower Chief

MASSACHUSETTS PORT AUTHORITY
Noise Abatement Office
Boston-Logan International Airport
East Boston, MA 02128-2042

428-2800
567-3333
Pike

Aircraft Disturbance Report

Person Reporting Disturbance:

Mr. Claudia Brede
15 Blackwood St.
Boston, MA 02115

Telephone:

Disturbance Date and Time: 14:45 on 28 Jul 98 to
14:46 on 28 Jul 98

Conditions:

Wind Direction:	200 deg	**Wind Speed:**	16 Knots
Ceiling:	4000 Ft	**Visibility:**	9.0 Miles

Runways in Use:

Arrivals:	27 - 22L
Departures:	22R - 22L

Complaint Description: For the last couple of weeks there has been an increase in noise. I bought this place last September and there was no problem. Yesterday between 9 pm and 11 pm a small plane flew overhead. The noise wakes my daughter up in the morning.

turbo prop

Massport Report of Investigation: You are affected by departures from Logan's Runway 22, in use with strong southerly winds. The FAA has been notified of your concerns by copy of this complaint.

Massport Reporter: Noise Abatement Office

MASSACHUSETTS PORT AUTHORITY
Noise Abatement Office
Boston-Logan International Airport
East Boston, MA 02128-2042

Aircraft Disturbance Report

Person Reporting Disturbance:

Ms. Claudia Brede
15 Blackwood St.
Boston, MA 02115

Telephone:

Disturbance Date and Time: 10:21 on 29 Sep 98 to
10:21 on 29 Sep 98

Conditions:

Wind Direction:	0 deg	**Wind Speed:**	5 Knots
Ceiling:	25000 Ft	**Visibility:**	10.0 Miles

Runways in Use:

Arrivals:	33L - 33R
Departures:	27 - 33L

Complaint Description: There is plane noise at 6 am. Why are they using Runway 27? Why are they flying in a bow shape? They should be higher before they start turning. It would not be as bad if they flew straight. This is a residential area. There is a plane every 30 seconds. It is not like this at other major airports.

Massport Report of Investigation: You are affected by jet departures on Runway 27, in use with northerly winds and a runway closure due to maintenance. A change of runway configuration occurred at 2:30 pm.

Massport Reporter: Noise Abatement Office

Send Copy: Yes

cc: FAA Boston Tower Chief

Letter 163
Claudia Brede
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
163.1	Alternatives	Runway 14/32	...Runway 14/32 will cause... a 300% increase in airplane traffic over our home, bringing with it increased noise and air pollution. Not to forget the possible damage to the very old buildings due to shaking vibration and sound waves. Not to mention the disastrous consequences, if a plane crashes in to our neighborhood.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the *Logan Airport ESPR* and its updates.
163.2	Noise	Impacts	As the noise levels are already unacceptable, any increase will cause a serious deterioration in the quality of life in our neighborhood as well as in a decrease of the value of our homes.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.
163.3	Alternatives	Peak Period Pricing	Massport needs to investigate alternatives such as peak hour pricing .	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. PPP is not recommended for implementation at this time because airline overscheduling is not a major contributor to current delays at Logan Airport. However, as a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary market signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
163.4	Regional Transportation	Regional Airports	Massport needs to investigate alternatives such as the use of regional airports, such as Massport owned Hansom Airport in Bedford, before adding to our burden.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.

4/20/99

Arthur Puglsley
Executive office of Environmental Affairs
100 Cambridge Street
Boston MA 02202
Attn: MEPA office

I live on the street level of an apartment in Boston's South End. In fact, my bedroom is yards away from Shawmut Avenue. On most weekends, I am awakened early, around 6 AM. The noise doesn't come from the sound of automobile traffic. Nor is it car radios, pedestrians walking by, sirens, or trucks that cause me to wake up. Instead, it is planes from nearby Logan airport. From 6 AM and lasting all day, these planes cause so much noise, that the peace and tranquility of a weekend in the South End is ruined. Even having a conversation with someone within earshot becomes a shouting match.

Now, Massport, and Gov. Celluci, want Logan to expand to accommodate more air traffic, thus causing more noise and pollution over nearby communities and forever destroying any semblance of quiet within our neighborhood.

Since moving here in 1996, I observed how little long term planning has gone into Boston's future. The most obvious examples of planning gone awry to this outsider include the ugly and obsolete Central Artery; the just plain ugly City Hall; and the badly located Logan Airport. Now, instead of addressing the real problem - that Logan is also becoming obsolete and should be relocated - Massport and Celluci want to throw a Band-Aid on this noisy, festering wound. Allowing air traffic to increase will be a sonic nightmare for the area residents. If South End residents don't like the noise now, it's certainly not going to improve once Logan expands and installs a new runway. Unlike Mayor Menino, the short sighted Celluci wants to appease the business and tourist trade with solutions that remedy the symptoms not actually solve the long-term problems. As South End residents, we will suffer more. 164.1

Certainly, the Big Dig, as unattractive as it is, is a step in the right direction, "righting the wrongs" of past bad planning in a way. Perhaps Massport could take a cue from the badly planned past and help create a more livable future instead of trying to 'soft sell" us with TV advertising or steamrolling runway expansion through the legislature. By proposing a new out-of-town airport, Massport and Celluci would show that they have the progressive ideas that were sorely lacking from past politicians and planners. This means having courage and risking one's political career to effectively *plan*.

Jon Burk
26 Worcester Street
Boston 02118

Cc Byron Rushing

Letter 164
Jon Burk
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
164.1	Noise	Impacts	If South End residents don't like the noise now, it's certainly not going to improve once Logan expands and installs a new runway.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.

April 20, 1999

Mr. Arthur Pugsley
Attn: MEPA Office
Executive Office of Environmental Affairs
100 Cambridge St.
Boston,
MA 02202

Re: Proposed Expansion of Logan Airport

Dear Mr. Pugsley:

I am writing to oppose the Massport proposal for an additional runway at Logan Airport. I believe this proposal is based on a flawed strategy for improving airport service, it increases pollution in neighboring communities that are subjected to a disproportionate environmental burden already, and results from an unwillingness by Massport to acknowledge or remedy the adverse impact Logan has on the surrounding community.

I understand the rationale for airport expansion is based on the anticipation of increased air traffic in the eastern Massachusetts, and the fact that Logan experiences significant delays in service. At the same time, Massport has indicated new runway is only a short-term remedy. I believe the following issues need to be addressed prior to approval:

- Massport must present a master plan for comprehensive review. It is ridiculous to approve airport expansion on a case-by-case basis. Massport claims that the new runway will only be unidirectional. Is this restricted use embedded in the long-term plan, or is the unidirectionality of the runway a temporary condition? 165.1 **MEPA must demand a full review of Massport's long-term airport expansion strategy.** 165.2
- It is evident that Massport has not made a serious effort to use facilities effectively. For example, it has not instituted a peak-pricing structure to shift traffic to off-peak times. Surrounding airports are operated far below capacity. Massport dismisses alternatives to expansion as "unworkable", which only suggests they cannot be trusted to implement remedies that would render expansion unnecessary. **MEPA must require Massport to exhaust all reasonable alternatives prior to the approval of Logan expansion.** 165.3
- This short-term Massport expansion anticipates increases air traffic at Logan. Thus, Massport proposes to increase pollution in neighboring communities. I oppose this additional pollution for personal reasons. I live under Logan flights and suffer from frequent loud jet engine noise. I shudder to imagine what tripling the frequency of

flights will do. **MEPA must cap, at the current level, the amount of noise, and other relevant pollutants, created by Logan activities**. Thus, Logan could expand as technological advances in pollution/noise reduction are implemented by airlines. 165.4

- It is important to review the history of the relations between Massport and the community. Massport has a history of broken promises with its neighbors. Of relevance is that fact that covenants exist in the Big Dig/Third Harbor Tunnel agreement that will be contravened by implementing this Massport proposal. Thus, Massport will discard its own recent agreement because it is expedient. **For this reason, MEPA must apply a higher standard for permit approval for entities such as Massport with a poor record of compliance or community relations.** 165.5

I hope my comments will be granted serious consideration. On a personal note, I am disgusted that Massport would offer this proposal without giving any opportunity for honest community input. This proposal anticipates an extremely negative impact on the quality of life of Logan's neighbors. Massport doesn't even care. I hope that you will.

Cordially,

Barry B. Corden

Barry B. Corden

119 Pembroke St. #3
Boston,
MA 02118

Letter 165
Barry B. Corden
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
165.1	Alternatives	Runway 14/32	Massport claims that the new runway will only be unidirectional. Is this restricted use embedded in the long-term plan, or is the unidirectionality of the runway a temporary condition?	The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (*i.e.*, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32. The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. We anticipate that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.
165.2	Alternatives	Preferred Alternatives	MEPA should demand a full review of Massport's long-term airport expansion strategy.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's *Logan Capacity Enhancement Plan* (October 1992); the *Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study* (December 1993); the *Logan Final GEIR* (July 1993); and the *Logan Airside Improvements Feasibility Study, Phase 1 Report*, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its *Boston Logan International Airport Capacity Enhancement Plan*. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the *Logan Airside Feasibility Study*, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.

Code	Topic 1	Topic 2	Comment	Response
165.3	Environmental Review Process	MEPA	MEPA should require Massport to exhaust all reasonable alternatives prior to the approval of Logan expansion	Refer to response to Comment 165.2.
165.4	Environmental Review Process	MEPA	MEPA must cap, at the current level, the amount of noise, and other relevant pollutants, created by Logan activities. Thus, Logan could expand as technological advances in pollution/noise reduction are implemented by airlines	The Airside Project will not change Logan Airport's airfield capacity of approximately 120 aircraft operations per hour. Regarding caps on airport operations, federal constitutional provisions (preemption, commerce clauses, equal protection), federal aviation statutes and regulations, and contractual provisions related to covenants in connection with the Federal Airport Improvement Program grants which Massport receives, restrict Massport's ability to control the number of aircraft operations at Logan Airport. Massport has undertaken a comprehensive mitigation program, such as Logan Airport Noise Rules, for those areas that fall within its powers as proprietor of Logan Airport, which are not preempted under federal law.
165.5	Environmental Review Process	MEPA	MEPA must apply a higher standard for permit approval for entities such as Massport with a poor record of compliance or community relations.	Comment noted.

LETTER 166

FAX

RECEIVED
APR 23 1999
MEPA

Date 4/22/99

Number of pages including cover sheet (4)

TO:
Mr. Salvu[illegible]i

Pho

F

CC:

FROM: Dukakis
Northeastern University
Department of Political Science
303 Meserve Hall
Boston, MA 02115

Phone 617-373-2796
Fax Phone 617-373-5311

Alan Graham 8683
1~~2~~30
Mar[illegible] ~~[illegible]~~
11:30 Sloan
Sterman

REMARKS [illegible] Reply ASAP ☐ Please Comment

I thought Fred Salvucci and I had buried the plan for a new runway at Logan Airport forever back in the 1980s.

Unfortunately, like the Phoenix, it's back-- and this time it makes even less sense that it did ten years ago.

Why? Because it is a very short term solution to what is a long term 166.1
problem that won't be solved by putting another runway in Boston Harbor.
That problem can be solved by using three important tools that are now
available to us. 166.2

The first is Amtrak's new high speed Acela express service that begins this fall-- ten trains a day between Boston and Washington that will carry thousands of former shuttle sufferers quickly and easily from Boston to New York in three hours, downtown to downtown. No more metal detectors. No more fuming at delays in the airport and on the runway. No more thirty dollar, one hour cab rides from LaGuardia into downtown New York.

And if you happen to live west, south or north of Boston, you can forget about fighting your way through the tunnels to Logan and a sixteen dollar a day parking tab. A new Amtrak station with two thousand parking spaces will be waiting for you at Route 128.

The second is not one, not two, but three regional airports, each located close to an older urban community that wants and needs growth. 166.3 Manchester, Worcester and Providence are all conveniently located within easy driving or rail commuting distance of thousands of Logan users who can be better served by these airports. Providence is already connected to Boston by road and rail, and a new station stop at Green Airport will be just minutes by a moving sidewalk from the terminal. The Massachusetts Turnpike Authority should get cracking on a spur from the turnpike to the Worcester Airport, which is just a few minutes shuttle ride from the magnificently restored Worcester railroad station. New Hampshire already plans to build a new highway connection to the Manchester Airport, and it wouldn't take much to extend existing commuter rail lines there as well.

Finally, some simple management steps at Logan would open up even more capacity for the longer flights that Logan is uniquely equipped to provide. 166.4 We tried one-- peak pricing-- in the 1980's with spectacular success. In fact, Logan went almost overnight from 18th to 2nd among the nation's major airports in on-time performance. Unfortunately, the small plane lobby went to work on the Reagan Administration, and we were ordered to revoke our landing fee plan. But there is absolutely no reason why small puddle jumpers should be taking up valuable airspace during some of Logan's busiest hours. Peak pricing requires them to adjust around those hours, and there are plenty of smaller airports in addition to Manchester, Worcester, and Providence that can accommodate them as well.

Mayor Menino had the good sense to call for a blue ribbon commission on the subject. I have what I think might be an even better idea. Governor Cellucci should call a summit meeting of his fellow governors from New Hampshire and Rhode Island and the mayors of the 166.5
four key cities that are involved. They should each bring their top transportation planners with them. Stan Bagley, a Massachusetts native and the very capable chief of Amtrak's Northeast division, should join them. In a matter of months they could put together a plan that would dwarf the piddling contribution that a new runway would make to the problem.

Then we could bury this misbegotten proposal once and for all with appropriate ceremonies and pronounce a final benediction over it.

Rest in peace.

Letter 166
Michael Dukakis, Northeastern University Dept. of Political Science Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
166.1	Alternatives	Preferred Alternative	... it is a very short term solution to what is a long term problem ...	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
166.2	Regional Transportation	Passenger Rail	... problem can be solved by using three important tools that are now available to us. The first is Amtrak's new high speed Acela express service...	Massport's analysis of regional alternatives is comprehensive and reflects all the major recommendations of various regional planning studies that have been conducted over the last decade. These include expansion of the regional airports and development of high-speed rail in the Boston-New York market.
166.3	Regional Transportation	Regional Airports	The second is not one, not two, but three regional airports ... Manchester, Worcester and Providence...	Since 1990, there have been several studies that have recommended regional initiatives to improve the efficiency of the region's inter-city transportation network. These studies reflect the cooperation of federal, state and local transportation agencies and stakeholders. Section 2.1 of the Supplemental DEIS/FEIR summarizes relevant regional planning studies and their conclusions. All studies have concluded that the Proposed Runway 14/32 and the other airside improvement projects at Logan Airport, along with increased use of the regional airports, including T.F. Green/Providence, Manchester and Worcester Regional airports, and high-speed rail services, are all necessary for accommodating the region's future inter-city air travel demand. Refer to discussion of the role of regional alternatives and steps Massport has taken to foster increased use of these alternatives in Chapter 2 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
166.4	Alternatives	Peak Period Pricing	Some simple management steps at Logan would open up even more capacity for the longer flights that Logan is uniquely equipped to provide. We tried one—peak pricing—in the 1980's with spectacular success. In fact, Logan went almost overnight from 18th to 2nd among the nation's major airports in on-time performance. Unfortunately, the small plane lobby went to work on the Reagan Administration, and we were ordered to revoke our landing fee plan.	Massport's analysis of regional alternatives is comprehensive and reflects all the major recommendations of various regional planning studies that have been conducted over the last decade. These include expansion of the regional airports and development of high-speed rail in the Boston-New York market. The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. PPP is not recommended for implementation at this time because airline overscheduling is not a major contributor to current delays at Logan Airport. However, as a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary market signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
166.5	Environmental Review Process	Blue Ribbon Panel	Governor Cellucci should call a summit meeting of his fellow governors from New Hampshire and Rhode Island and the mayors of the four key cities that are involved. ... In a matter of months they could put together a plan that would dwarf the piddling contribution that a new runway would make to the problem.	In November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. A second summit was held in December 2000. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives.

Irv Englander
131 West Concord Street
Boston MA 02118
Phone: (617) 267-0206
email: lenglander@bentley.edu

LETTER 167

Thursday, 22 April, 1999

Mr. Arthur Pugsley
Executive Office of Environmental Affairs
100 Cambridge Street
Boston MA 02202

Dear Mr. Pugsley,

As a resident of Boston's South End for more than 25 years, I must register my strong opposition to the Massport runway expansion plan. I am not qualified to speak for other sections of the city, but I believe I can accurately state that the plan will negatively affect the quality of life in the South End, Roxbury, and Jamaica Plain so severely as to undo much of the growth and economic gain accomplished in the recent past.

I live approximately three miles from the end of runway 27. Although my house is more than ½ mile from the center of the designated takeoff path, airplanes take off directly over my house frequently. At their worst, a not uncommon occurrence unfortunately, planes take off every 45 seconds. Peak noise levels in excess of 90 db are common, and I have personally measured many planes with peak sound levels in excess of 105 db. The roar of jet planes is particularly onerous. The roar of an individual plane can often be heard for two minutes (with additional reinforcement every 45 seconds!). When airplanes are flying overhead it is virtually impossible to sleep, carry on conversation, or even watch TV. Six A.M. is a busy time, so morning sleep is out of the question. If runway 27 is also in use the previous evening, airplanes will take off until midnight, and occasionally even later, limiting the total number of hours of sleep to six or less.

Massport acknowledges that the runway plan will triple the number of airplanes passing over our houses, which is itself well beyond acceptability, but I have good reason to believe that the noise effects will more than triple. In my experience and measurements made over the years, small planes do not generate either the level of noise nor the pervasive roaring type of noise created by the larger jets. If the smaller planes are diverted to the new runway and the number of planes over our neighborhood tripled, the noise increase will far exceed the level of noise suggested by Massport. The number of nights for which more than six hours of sleep is possible will obviously decline substantially. 167.1

167.2 Massport has clearly pulled out all of their guns to win approval for the expansion plan. After being chastised for attempting to spend public money on advertising, it has persuaded business leaders to finance full page ads in favor of its plan. It has attempted to pit neighborhood groups against each other, and it has attempted to paint those opposed to the expansion as anti-business. I am hardly anti-business: I teach in a business department at Bentley College, and consult to business. I understand the need for efficient airport access and operation. However, that need must not be allowed to take absolute precedence over a reasonable quality of life for the citizens of Boston.

There have been many days in which the airplane noise has tempted me to give up the many years of effort I put into building my home and improving my neighborhood. If the noise increases even as much as Massport admits, I fear that I will no longer be able to remain in my home. Many of my neighbors have expressed the same opinion: that, with great reluctance, they will find it necessary to abandon the city in favor of sleep and quality of life.

This situation must be weighed fairly in tradeoff with the needs of business and other travelers to Boston. With the political climate strongly in favor of Massport, it seems that the state Office of Environmental Affairs and the U.S. Environmental Protection Agency are the only ones who are in a position to protect the interests of the citizens of Boston, and that the intense noise pollution proposed with its accompanying deterioration of the quality of life is a serious and reasonable concern to be addressed by these offices.

167.3 As a footnote, I might add that it is difficult for me not to be skeptical of any claims or promises that Massport makes. After working on a committee of FAA, Massport representatives, commercial pilots, scientific analysts, and citizens for ten years to establish a reasonable takeoff pattern for runway 27, airplanes using runway 27 still do not adhere to the runway pattern developed. Although Massport claims that the pilots are unable to fly the pattern accurately, commercial pilots that I have met have told me that the pattern is perfectly reasonable, but that the control tower makes virtually no effort to enforce the pattern. Use of the developed pattern would provide substantial noise relief for the community, but Massport appears to have little concern for anything but its own interests; its promises ring hollow to me.

Sincerely yours,

Irv Englander

Cc: State Rep.Byron Rushing
U.S. Rep. Michael Capuano

U. S. Rep. J. Joseph Moakley
Mayor Thomas Menino
City Council Pres. Jim Kelly
Editorial Room, Boston Globe
Editorial Room, Boston Herald
Anastasia Lyman, Runway 27 Coalition
Editorial Room, South End News
J. DeVillars, Regional Administrator, U.S. Environmental Protection Agency
Jane Garvey, U. S. Federal Aviation Agency

Letter 167
Irv Englander
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
167.1	Noise	Impacts	Massport acknowledges that the runway plan will triple the number of airplanes passing over... [The South End] which is itself well beyond acceptability, but I have good reason to believe that the noise effects will more than triple. In my experience and measurements made over the years, small planes do not generate either the level of noise nor the pervasive roaring type of noise created by the larger jets. If the smaller planes are diverted to the new runway and the number of planes over... [The South End] tripled, the noise increase will far exceed the level of noise suggested by Massport.	Massport and the FAA stand by the estimates in this document.
167.2	Purpose and Need	Delay	I understand the need for efficient airport access and operation. However, that need must not be allowed to take absolute precedence over a reasonable quality of life for citizens of Boston.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the *Logan Airport ESPR* and its updates.
167.3	Noise	Runway Use	Although Massport claims that the pilots are unable to fly the [Runway 27] pattern accurately, commercial pilots that I have met have told me that the pattern is perfectly reasonable, but that the control tower makes virtually no effort to enforce the pattern. Use of the developed pattern would provide substantial noise relief for the community.	Since the new departure procedure was implemented in accordance with the *Runway 27 EIS*, Massport and the FAA have been monitoring and analyzing aircraft flight track data for compliance and to determine the need for changes to achieve the objectives. Pilots are responsible for knowing and complying with noise abatement procedures unless otherwise instructed. As more aircraft are equipped with GPS navigation, compliance should improve.

LETTER 168

March 23, 1999

Bob Durand, Secretary
EOEA, Attn: MEPA Office
Arthur Pugsley, EOEA #10458
100 Cambridge Street, 20th Floor
Boston, MA 02202

RE: **Draft Logan Airside Improvements (a/k/a Runway 14/32)** EOEA #10458

Dear Mr. Durand:

168.1 1. I am **OPPOSED** to Runway 14/32 as any benefits of same are strongly outweighed by the resulting adverse health, environmental, and economic costs on myself, my neighbors and other metropolitan area residents.

2. As a homeowner residing adjacent to Franklin Park, I am already negatively impacted by Logan Airport's overflights resulting in loss of sleep, irritability, loss of use/enjoyment of my yard and garden, concerns re pollutants and health impacts, and diminishment of enjoyment of public spaces such as Franklin Park and the Arnold Arboretum.

168.2 3. Runway 14/32 will further increase the adverse health, environmental, economic, and quality of life impacts on myself and my neighbors from these overflights. It will also negatively impact area children's health and learning as the planes are clearly audible within, for example, English High School where I attended Massport's informational meeting on this matter.

168.3 4. Massport should be required to withdraw this proposal and perform a comprehensive study, including, analysis of the health, environmental, and economic costs on the affected communities, using current data, and including maximum utilization of other pre-existing regional airfields.

Name: Brian Gallagher
Address: 11 Stedman Street, #1
Boston, MA 02130
Phone: (617) 982-3542

Letter 168
Brian Gallagher
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
168.1	Alternatives	Runway 14/32	I am opposed to Runway 14/32 as any benefit of same are strongly outweighed by the resulting adverse health, environmental, and economic costs....	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.
168.2	Alternatives	Runway 14/32	Runway 14/32 will further increase the adverse health, environmental, economic, and quality of life impacts.....	Refer to response to Comment 168.1. Refer to Chapter 6 of the Supplemental Draft EIS/FEIR for a discussion of environmental impacts of the Preferred Alternative.

Code	Topic 1	Topic 2	Comment	Response
168.3	Environmental Review Process	MEPA	Massport should be required to withdraw this proposal and perform a comprehensive study, including, analysis of the health, environmental, and economic costs on the affected communities, using current data, and including maximum utilization of other pre-existing regional airfields.	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts. The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion that greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.

LETTER 169

Arthur Pugsley
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 0--2202
Attn: MEPA Office

April 20, 1999

Dear Mr. Pugsley,

I'm writing to register my opposition to Massport's Runway 14/32 (airport expansion) project. What concerns me most is how this will impact the city I love so
much. The size of this city is what drew me here from New York. With an 169.1
increase in air traffic we will loose the very thing that makes this city so livable.
And all this for convention attendees who don't even live here? Who barely leave their hotel? Let them go to NYC if they want a crowded, dirty, noisy location for their meeting. If they want a walkable, livable city to enjoy during their stay then they will come here and put up with a few delays (but as you know there are delays at the largest airports).

I would secondly oppose the project because it could triple the number of flights
over the South End which not only is my home but is one of the most desirable 169.2
neighborhoods in Boston. Increased flights will most definitely have an impact on this, and the general quality of life we enjoy here in this city. Personally, I'm willing to give up any financial gain in order to maintain the quality of life I enjoy here.

Boston's advantage is it's manageable size, The fact that one can walk around easily and actually "experience" the city while you are visiting - even if only for a short time. We offer water, shopping, history, gardens and architecture all within a short distance; in a city that seems the size of a large village....and we need to preserve this.

I hope for your support on this matter,
Sincerely,

Nina Garfinkle

Letter 169
Nina Garfinkle
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
169.1	General Opposition			Comment noted.
169.2	Alternatives	Preferred Alternative	...project ... could triple the number of flights over the South End which not only is my home but is one of the most desirable neighborhoods in Boston....	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.

LETTER 170

Cc:
Bcc: Arthur Pugsley@MEPA@EOEA
From: "Sandra Gibbs" <skgibbs@worldnet.att.net>
Subject: comments on Logan airside improvements Draft EIS
e: Wednesday, April 21, 1999 14:53:37 EDT
ach: MEPA letter-SKG-Gen.doc
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

Attached please find my comments on the Massachusetts Port Authority's Draft Environmental Impact Statement on its airside Improvements Planning Project. I would ask that you reject their proposal.

LETTER 170

61 RUTLAND STREET
BOSTON, MA 02118

April 22, 1999

Robert Durand, Secretary
Executive Office of Environmental Affairs
100 Cambridge St.
Boston, MA 02202
Att: MEPA Office/Arthur Pugsley

Dear Secretary Durand:

I am writing to give my comments on the Massachusetts Port Authority's Logan Airport Airside Improvements Planning Project Draft Environment Impact Statement.

I am a 34 year resident of the South End of Boston, directly under the flight path of Runway 27, which is slated to see an increase of as much as three times the current air traffic under which we suffer today. The neighborhood in which I live is a multi-ethnic, multi-economic and multi-generational one.

It is my strong feeling that Massport's DEIS does not make a credible case for its project and should be rejected for the following reasons:

1. **It will impose an unacceptable noise burden upon my community without any commensurate benefit either to Logan Airport or to the citizens of the Commonwealth.** The EIS, as I read it, argues a narrow case for construction of a new runway and taxiway without examining in appropriate detail how these construction projects will adversely affect the surrounding impacted communities. The EIS similarly fails to evaluate the effect of the increased demand which will be generated by the proposed construction project on its terminal facilities, baggage handling, parking capacity, public transportation and road access at the airport. 170.1

2. **The project, by Massport's own account in the DEIS, will generate, at best, limited, dubious and short term benefits for the traveling public while imposing onerous and permanent noise and pollution burdens on Massport's neighbors.**

3. **Massport has failed to perform any outreach to impacted non-English-speaking Latino residents in my community.** There is a large community here, several thousand residents in the development of Inquilinos Boricuas En Accion, who will be severely and adversely impacted by this proposed runway construction project. Several hundred more are low-income tenants of the Boston Housing Authority. Massport's failure to attempt any 170.2

education of the non-English speaking population, coupled with their refusal to meet with other members of the South End community seems in direct violation of the standards set forth in President Clinton's Environmental Justice Executive Order promulgated early in his administration.

4. **Massport's paid advertising campaign, during the public comment period, is an outrageous violation of the spirit of the environmental laws with which Massport has to comply in order to receive approval for this project.** 170.3 That it would engage in such a blatant attempt to influence the environmental process by purveying false and misleading information about the purposes and results of this complex project should, in itself, be viewed as grounds to reject the DEIS. If left to stand, it will make a mockery of the environmental process itself. Many more people will have heard the false claims in the TV and radio advertising than will have had access to the Environmental Impact Statement. That Massport refused to hold educational meetings in many communities and failed to provide any information in the Spanish language while engaging in deceptive advertising should be severely sanctioned. The appropriate sanction is requiring withdrawal of the DEIS. In no event should Massport, or a group calling itself Citizens for Efficient Regional Transportation, be allowed to submit to MEPA any results from an alleged "survey" being conducted in conjunction with this campaign. The "survey" is completely biased and uses invalid polling methods to come up with a result predestined to favor the project.

170.4

5. **Massport's assertions about delay are questionable at best.** The Citizens Advisory Committee to Massport (CAC) has determined that Massport failed to use readily available data on delay from the FAA to support its representations about the severity of the problem at Logan. My community's representative on that body has convinced me that there is no basis for Massport's assertions about the new runway as a tool for delay reduction at the airport. To the contrary, it appears that the delay situation will worsen within 5 years or less while Logan will have subjected its neighbors to an environmental nightmare of noise and pollution. At the least, the DEIS should be withdrawn and Massport should be required to compute actual delay data for Logan airport.

6. **The EIS makes short shrift of logical solutions to congestion and delay at the airport** 170.5
such as Peak Hour Pricing and regional alternatives such as Massport-owned Hanscom 170.6
Field.

In short, *Massport's Draft Environmental Impact Statement is fatally deficient. It should be rejected or withdrawn from consideration by the EOEA. A new study should be required based on a broader scope and a higher standard for community education and input.* Thank you for your consideration.

Very truly yours,

S. Kay Gibbs

Letter 170
S. Kay Gibbs
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
170.1	Alternatives	Preferred Alternatives	It will impose an unacceptable noise burden upon my community without any commensurate benefit either to Logan Airport or to the citizens of the Commonwealth.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-7 of the Supplemental DEIS/FEIR.
170.2	Environmental Justice	Impacts	Massport has failed to perform any outreach to impacted non-English-speaking Latino residents in my community.	Massport has involved the Hispanic community in public review of the Airside Project. Copies of the Airside Project Draft EIS/EIR were distributed to the Chelsea Human Services Collaborative, the Centro Hispano de Chelsea, and the Chelsea Commission on Hispanic Affairs. Consistent with FAA policy of providing translation on request, a Spanish-language interpreter was present at a meeting on February 23, 1999 with the Latin American Planning and Development Group. Massport also held a public hearing on March 3, 1999 with the Chelsea City Council at which over one hundred citizens had the opportunity to provide comment to Massport officials following a presentation of the Proposed Project.
170.3	Environmental Review Process	Public Process	Massport's paid advertising campaign, during the public comment period, is an outrageous violation of the spirit of the environmental laws with which Massport has to comply in order to receive approval for this project.	Massport did not sponsor television, radio, or newspaper advertisements for the Airside Project. Since the initial scoping, FAA and Massport have established a dialogue with the Airside Review Committee (ARC), community leaders and the public through hearings, briefings, and circulation of over 700 copies of the *DEIS/EIR* for comment. At public meetings and at the request of interested community members, Massport has provided the public access to information about the Airside Project and its associated social and environmental effects. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the *DEIS/EIR*, the FAA held two public hearings.

Code	Topic 1	Topic 2	Comment	Response
170.4	Delay	Model	Massport's assertions about delay are questionable at best.	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. Chapter 1 and Appendix C include a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.
170.5	Alternatives	Peak Period Pricing	The EIS makes short shrift of logical solutions to congestion and delay at the airport such as Peak Hour Pricing.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. The analysis indicates that PPP is an effective option when airlines schedule beyond the normal hourly operating capacity of the airport. PPP is not recommended for implementation at this time because airline overscheduling is not a major contributor to current delays at Logan Airport. However, as a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary market signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
170.6	Regional Transportation	Regional Airports	The EIS makes short shrift of logical solutions to congestion and delay at the airport such as regional alternatives such as Massport-owned Hanscom Field.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.

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(617) 421-9134 / sterlg@aol.com / no fax available

April 19, 1999

LETTER 171

Arthur Pugsley
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202
attn: MEPA Office

Dear Mr Pugsley:

Please know that I am a registered voter and I am strongly opposed to the construction of Runway 14/32. Our priorities must be a livable city now and long-term (not short-term) tourist, convention, and business growth. Only the former can foster the latter in a lasting, significant manner. 171.1

Sincerely,

Sterling Giles

Sterling Giles

cc: Representative Byron Rushing

Letter 171
Sterling Giles
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
171.1	General Opposition		...I am strongly opposed to the construction of Runway 14/32.	Comment noted.

LETTER 172

April 22, 1999

Bob Durand, Secretary
Executive Office of Environmental Affairs/MEPA Office
Arthur Pugsley, EOEA No. 10458 (Logan Airside Improvements Planning Project)
100 Cambridge Street - 20th Floor
Boston, MA 02202

Dear Secretary Durand:

172.1 We are writing in opposition to MASSPORT's Logan Airside Improvements Planning Project and request that your office (i) withhold issuance of a certificate; (ii) require a much more rigorous review of alternatives to the new runway; and (iii) require substantiation and an in-depth analysis of the cause of the purported conditions at the airport. MASSPORT's stated need for the project is two-fold: to reduce delay and enhance safety; the DEIR does not support either claim. In addition, MASSPORT has failed to substantiate its contentions in the public hearings held on this project. The Mayor's Director of Environmental Affairs has submitted comments to the EOEA addressing indirect traffic, congestion, and air pollution impacts of the proposal on the City. We agree that these issues warrant analysis and urge your office to fully consider these comments in your decisionmaking process. In addition, we appreciate your consideration of the concerns discussed below.

172.2 We live in the South End, the primary attraction for commercial and residential development in the City for the last several years. Already we are adversely impacted by the failure of pilots to stick to the flight path of Runway 27. If proposed Runway 14/32 is constructed, the South End will face a 300% increase in flights over our skies. This could potentially halt all development in the South End and result in plummeting property values as well as property taxes. The City, and by extension the Commonwealth, depends on the continued growth of the South End, which has also become an attractive tourist destination due to the historical significance of the area, the diversity of culture, and the nationally recognized restaurants which make the South End their home.

The measurement of current delays is widely different among MASSPORT, the FAA and an 172.3
outside consultant. If we're not able to come to some consensus on what the issue really is, how
are we going to be able to resolve it? The EOEA should require an independent analysis of the
existing conditions and the benefits that could potentially be derived from a new runway from
reducing delays, as well as a comparison of any potential benefits to the definite detriments that 172.4
would occur in terms of noise, air pollution, visual impact and increased automobile traffic. It is
likely that the option with the least environmental impact will be the no-build option.
MASSPORT's claim that a new runway would enhance safety appears to be little more than a
public relations pitch unsubstantiated by any concrete data.

There are many alternatives to the new runway that have not been fully analyzed and are too
readily dismissed, such as the no-build option or utilizing Hanscom Field or Worcester Regional 172.5
Airport instead. MASSPORT should be required to demonstrate that there is absolutely nothing
they can do at Logan to improve alleged flight delay problems absent construction of a new
runway. In addition, there has not been sufficient debate regarding sending small planes (for 172.6
which the runway is proposed to be built) to Hanscom Field (the airport designed to accept small
aircraft). Certainly the environmental impacts associated with utilizing Hanscom, where
approximately 40,000 residents would be impacted, pale in comparison with the impacts
associated with building a new runway at Logan, where (according to MASSPORT) 1.2 million

people are affected. No reasonable person wants planes flying over his head, yet the 1.2 million impacted people in Boston that are saying “no” don’t seem to have as much influence as the impacted people in Bedford and surrounding areas. Hanscom is located right on Route128, where most businesses are, where other businesses are trying to reach and where people would benefit most. Another argument against Hanscom has been the need to preserve historical monuments in the area. There is no more historical place in the country than the City of Boston. The red line is only 8 miles from Hanscom, an extension of which would bring people right to downtown Boston and right to Logan airport. An extension could easily be built by going under any historical sites. Airforce One just landed at Hanscom last week, so the facility must be capable of handling all-size planes.

Utilizing the under-utilized Worcester Regional Airport also makes good environmental and economic sense. Most of the people using Logan do not reside in the City, yet it is the residents of the City who bear all of Logan’s impacts. If the majority of the people who need to fly out of Massachusetts live closer to Worcester and/or Hanscom, why not make use of the airports closer to their residences rather than expand an airport that is already the most difficult airport to access by both air and land? 172.7

We are stuck with Logan where it is now, but we should not make a bad situation worse. Economic development in the Commonwealth is not dependent on access to Boston only, but access to Western, Central, Northern and Southern Massachusetts as well. If all the economic activity is centralized in Boston and Logan is still difficult to access, then the result will be contrary to what the project proponents are contending; i.e., businesses will look outside of the Commonwealth for both permanent operations and short-term activities (ex. conferences, business meetings).

We respectfully request that the EOEA require a much more exhaustive analysis of the impacts associated with the proposed expansion at Logan than what was presented in the DEIR. We also ask that the agency refrain from issuing a certificate to MASSPORT because the majority of the people don’t want it due to the environmental impacts it would cause. If the issues of aircraft delay and safety enhancement are as serious as MASSPORT says, they certainly warrant a more careful examination and selection of long-term, instead of short-term solutions.

Sincerely,

Kathleen D. Hathaway

Robert and Kathleen Hathaway
220 West Canton Street
Boston, MA 02116-5814

C: Senator Edward Kennedy
Senator John Kerry
Congressman Joe Moakley
Congressman Mike Capuano
Governor A. Paul Cellucci
Representative Byron Rushing

Letter 172
Robert and Kathleen Hathaway
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
172.1	Environmental Review Process	MEPA	We are writing in opposition to Massport's Logan Airside Improvements Planning Project and request that your office (i) withhold issuance of a certificate; (ii) require a much more rigorous review of alternatives to the new runway; and (iii) require substantiation and an in-depth analysis of the cause of the purported conditions at airport.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. Refer to Section 4.6 of the Supplemental DEIS/FEIR for a discussion of the operational benefits of the Preferred Alternative and to Chapter 6 of the Supplemental DEIS/FEIR for a discussion of environmental impacts of Preferred Alternative.
172.2	Alternatives	Runway 14/32	...we are adversely impacted by the failure of pilots to stick to the flight path of Runway 27. If proposed Runway 14/32 is constructed, the South End will face a 300% increase in flights over our skies. This could potentially halt all development in the South End and result in plummeting property values as well as property taxes.	Both the *Logan Airport 1997 Annual Update* and *Logan Airport 1998 Annual Update* reported that aircraft were not achieving the goals of the 1996 FAA ROD and that further testing was needed to get improved conformance. The FAA is currently funding an analysis of the procedure and meets periodically with the Runway 27 Advisory Committee to report interim findings. The *Logan Airport 1999 ESPR* (previously GEIR) reports on flight track monitoring which includes Runway 27 test results. The Runway 27 departure tracks have been reviewed in more detail in Section 4.3 of the Supplemental DEIS/FEIR.
172.3	Delay	Model	The measurement of current delays is widely different among Massport, the FAA and an outside consultant.	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. Chapter 1 and Appendix C include a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.
172.4	Alternatives	Runway 14/32	The EOEA should require an independent analysis of the existing conditions and the benefits that could potentially be derived from a new runway from reducing delays, as well as a comparison of any potential benefits to the definite detriments that would occur in terms of noise, air pollution, visual impact and increased automobile traffic.	To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study.

Code	Topic 1	Topic 2	Comment	Response
172.5	Alternatives	Other Non-Construction Alternatives	Massport should be required to demonstrate that there is absolutely nothing they can do at Logan to improve alleged flight delay problems absent construction of a new runway.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's *Logan Capacity Enhancement Plan* (October 1992); the *Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study* (December 1993); the *Logan Final GEIR* (July 1993); and the *Logan Airside Improvements Feasibility Study, Phase 1 Report*, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its *Boston Logan International Airport Capacity Enhancement Plan.* The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the *Logan Airside Feasibility Study*, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.
172.6	Regional Transportation	Regional Airports	...there has not been sufficient debate regarding sending small planes...to Hanscom Field....	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.

Code	Topic 1	Topic 2	Comment	Response
172.7	Regional Transportation	Regional Airports	Utilizing the under-utilized Worcester Regional Airport also makes good environmental and economic sense.	Since 1995, Massport has worked closely with the City of Worcester to aggressively market the Worcester Regional Airport to airlines. Massport increased its involvement with the Worcester Regional Airport by assuming operational responsibility of the airport on January 15, 2000. By its agreement with the City of Worcester, Massport could assume ownership of the Worcester Regional Airport by 2005. On February 1, 2000, Delta Connection began serving Worcester Regional Airport with two daily nonstop roundtrip flights on regional jet aircraft to Atlanta. On July 6, 2000, American Eagle began service to New York JFK Airport with three daily nonstop roundtrip flights on turboprop aircraft. Massport is in ongoing discussions with other carriers regarding potential new services at Worcester Regional Airport. In addition, MassHighway is analyzing alternative highway routes that would improve surface access from I-90 and I-290 to the Worcester Regional Airport and filed an ENF in December 1999. They have begun the preparation of a Airside Project Draft EIS/EIR for these improvements. In addition to the Worcester Regional Airport, Massport has pursued a variety of initiatives to promote the use of other alternative regional airports and travel modes with the goal of relieving traffic growth pressures at Logan Airport. For example, in November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. Refer to Section 2.2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives.

ANN HERSHFANG
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LETTER 173

March 1, 1999

Secretary Bob Durand
Executive Office of Environmental Affairs
100 Cambridge Street
Boston 02202

Attn: MEPA office re: Runway 14/32

Dear Secretary Durand:

This letter requests your office to (1) extend the deadline for the environmental process on proposed new Runway 14/32 so that citizens have sufficient time to analyse Massport's documents and (2) make a final decision that honors the quality of life of near neighbors of Logan Airport. 173.1

If built, Runway 14/32 will inflict an unacceptable noise impact on adjacent neighborhoods all around the airport. It will add capacity, triple use of Runways 9/27 and 15/33 and inflict heavy noise on Boston neighborhoods in particular, including East Boston, Charlestown, South Boston, South End, Beacon Hill, Back Bay, Roxbury, Jamaica Plain, and possibly even further southwest areas like Hyde Park, Roslindale and West Roxbury. 173.2

Building this runway reverses 25 years of pathbreaking noise abatement programs and policies by Massport--which included a noise-abatement overwater take-off turn from Runway 22R, emphasizing overwater use of Runway 15/33, night-time restrictions on noisy planes, and an extensive soundproofing program for schools, hospitals and residences.

Twenty-five years ago the Massport Board initiated these nationally renowned noise abatement policies in an Airport Master Plan (1976) which also included other good neighbor commitments--no further expansion of the land area of Logan, $1 million to the East Boston Health Center, a sizeable payment-in-lieu-of-taxes to Boston and Winthrop, transferring the Belle Isle Marsh to the MDC, conveying blockbusted parcels in East Boston to abutters, moving triple-deckers from Neptune Road to Coleridge Street and a committment to build Piers Park and Jeffries Point Park. These policies have continued through the years until now.

In 1975, everyone said such noise and good neighbor policies would mean the death of the airport and increased danger for airlines and

Letter 173
Ann Hershfang
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
173.1	Environmental Review Process	MEPA	This letter requests your office to (1) extend the deadline for the environmental process on proposed new Runway 14/32 so that citizens have sufficient time to analyze Massport's documents...	In January 2000, the FAA called for the preparation of a Supplemental Draft EIS (SDEIS) after the conclusion of a SDEIS Panel review process. The SDEIS Panel, which consisted of 6 representatives appointed by the Governor and the Mayor of Boston, met over a ten-month period from March 2000 to December 2000. As a result of the FAA's actions, the environmental review process for the Logan Airside Improvements Project was extended by more than one year.
173.2	Alternatives	Runway 14/32	If built, Runway 14/32 will inflict an unacceptable noise impact on adjacent neighborhoods all around the airport.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-7 of the Supplemental DEIS/FEIR.

LETTER 174

ANN HERSHFANG
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April 22, 1999

Executive Office of Environmental Affairs
100 Cambridge Street, 2nd floor
Boston MA 02205
email: arthur.pugsley@state.ma.us

RE: Case #10458 Runway 14/32

Dear EOEA,

This letter requests your office to reject Massport's inadequate Draft Environmental Impact Statement on proposed Runway 14/32 and to require Massport to develop a new DEIS that includes a full, fair and honest presentation of all relevant data, dates and impacts. 174.1

A new DEIS should fully describe benefits from alternative actions, such 174.2
as (1) diversion to Hanscom Field and other regional airports, (2) gains from 174.3
peak hour pricing based on a reasonable threshold (115 flights is too high),
(3) the high-speed Boston-New York rail service which begins this fall, and (4) 174.4
a second-major airport, starting from the recommendations in the 174.5
Massachusetts Aeronautics Commission report. These combined actions can
do more to solve any existing Logan delay than a new runway, which even
Massport estimates will be effective for five years or less.

Complex solutions to complex problems have been successful before--and at Massport. Twenty-five years ago the Massport Board considered the proposed Runway 14/32 along with operating changes designed to minimize noise and other impacts on surrounding neighborhoods. Then, business interests offered the same knee-jerk reactions about economic and job losses. In spite of those predictions, Massport adopted broad noise-abatement and community restoration policies in a 1976 Master Plan, and the runway was not built.

The airport survived and thrived. Passengers increased from 11 million in 1976 to 26 million in 1998, flights from 260,000 in 1976 to 500,000 in 1998.

Now, by proposing Runway 14/32, the current Massport administration for the first time in 25 years would move over water flights back over residential areas. Small planes would land over water on 14/32; other arrivals would also land over water. This would shift large jet departures, which are noisier, to Runways 27 and 33 and triple their number. They will fly over the close-in populated areas of East Boston, Chelsea, Everett, Somerville, Cambridge, Charlestown, South Boston, South End, Beacon Hill, Back Bay, Roxbury, Jamaica Plain, Hyde Park, Roslindale, West Roxbury, Brookline and Newton. More people live under these two runways than live under all the other Logan runways combined. Is this a "fair" distribution of noise.

The real issues here are regional fairness and inadequate long-range planning by Massport not the livelier and irrelevant scenarios favored by news coverage. This is not a "turf war" or partisan "political wind." Runway 14/32 is truly about noise, neighborhood destruction, loss of enjoyment and property value. It involves real people and real damage to real people in their homes and neighborhoods. It is truly an environmental issue.

A few specific observations about the DEIS:

1. Peak hour pricing: Of all DEIS deficiencies, the lack of serious analysis of peak hour pricing is the most disappointing. Peak hour pricing would free up Logan airspace and reduce delay by pricing out underloaded carriers. Massport instituted a peak hour program in the 1980s which successfully reduced operations and delay until courts invalidated it as too broad. A legally compliant program was subsequently prepared and ready for implementation in 1990 but has never been tried. Peak hour pricing--a market-based solution--could be in place relatively quickly at a low cost. 174.6

2. Noise: 174.7

- There is only one small, unreadable noise contour chart in the EIS, with no identifying city or street name. Its obscurity must be a deliberate deception. A better presentation must be required, and the impact of doubling/tripling noise over residential areas must be made clear. 174.8
- Massport's computer calculations in the DEIS consistently understate noise compared to that measured by microphones in the field.
- Could Massport have chosen 1993 as base year to minimize the projected noise increase.
- In 2000 the airline fleet is required to be 100% stage III compliant. Noise benefits of 100% stage III equipment should be calculated first, then the impact of 14/32. This serious flaw justifies withdrawal of the DEIS. 174.9

3. Equity: The equity of locating airport noise pollution in the Commonwealth's poorest neighorhoods deserves more than four pages out of four volumes. Massport's unsupported conclusion that low-income communities do not receive a disproportionate impact requires further explanation. 174.10

4. Delay:

- Why does Massport's use a formula which calculates more delay than the FAA's.
- Why is a new runway necessary now since there is less delay than in 1993.
- What is actual delay, as opposed to projected.
- How has, and how might, airline consolidation reduce delay. Why doesn't Massport jawbone airlines into consolidation as airport management is now doing in San Francisco, another delay-prone airport. 174.11
- How much of the delay is caused by snow, fog, airline equipment, airline scheduling/cancellations, air traffic control shortcomings, lack of airside space, etc., rather than wind direction and runway availability.

Runway 14/32 must not be approved until all the relevant issues are fairly, openly and honestly examined and discussed.

Massport suggests restrictions that are enforceable only by the Federal Aviation Administration-- one-way use of 14/32 and "fair" distribution of noise. The FAA's record at enforcing its prior commitments is poor. FAA's tower has not effectively used the Preferential Runway Assignment System to share the noise burden. It has not strongly enforced the Runway 22 departure noise-abatement turn. 174.12

Quite recently, FAA has thrown up its hands about enforcing the Runway 27 departure track over the Fort Point Channel industrial area. After 3+ years of night meetings, residents under the Runway 27 flight path thought we had a commitment from the FAA on this "noise-abatement" departure. Now, as the enclosed article indicates, and as the planes overhead from 6:15 am these last several days prove, the FAA either cannot or will not enforce that agreement mandated after a successful suit won by the Runway 27 coalition.

The State of Massachusetts, must protect us and our environment. Neither Massport nor the Federal Aviation Administration will do so.

Thank you for your consideration of these comments.

Sincerely,

Ann Hershfang

ight path called the wrong way

Residents peeved planes stay off course

BY JEFF SKRUCK
STAFF WRITER

Aviation officials last week told members of the Runway 27 Coali-ion that they have done all they can o maintain flight tracks designed to educe jet noise from the Logan [illegible] Airport which im- acts the South End and several ther neighborhoods.

Federal Aviation Administration [illegible] Massachusetts Port Author- [illegible] airplane pilots say [illegible] flight corridor defined y an environmental impact study s "unreasonable" and beyond urrent technology, said Kurt Nalter, a member of the Run- way 27 coalition.

But for members of the coa- ition that just isn't good nough.

"They say, 'We've done our [illegible] We can't do any better,'" aid Walter, a former South End esident. "Needless to report, he community members are ot happy with this report."

at's more, the aviation officials' latest e contradicts what they have said for the ear and a half, according to coalition bers.

ey basically said it was doable and a nd-a-half later they say, 'We don't know and we can't make it better,'" said sia Lyman, president of the coalition. Jan. 25 meeting was the latest review Runway 27 flight track monitoring, a s that began 10 years ago with the on's law suit agai [illegible] AA, resulting environmental [illegible] udy.

The purpose of the review process is to contain about 68 percent of departing aircraft within one standard deviation of the flight path, a corridor that hangs between South Boston and the South End. Radar data measures if the planes are following the flight path by determining whether the planes pass through five gates.

Members of the Logan Airport Citizens Advisory Council, FAA, Massport and pilot representatives reviewed flight tracks for September, October and November at the meeting.

"As we suspected, the number of planes achieving all five gates had dropped from 50 percent or so over the summer to an abysmal 34 percent by October," Walter stated in a press release.

The Runway 27 coalition formed in 1978 and won a lawsuit nearly a decade later against the Federal Aviation Administration that led to the coalition and the FAA to work on an environmental impact study. Coalition members have said there has been no successful change in the noise for any of the communities. The coalition continues to meet with the FAA and Massport to fine tune the flight track.

While airport officials said they have pretty much done the best they can with the current technology, the citizens advisory council got some encouragement from Northwest Airlines. Company officials agreed to flight test an improved flight procedure for their planes for the next three months. The planes fly with the latest Flight Management System (FMS) technology, a system that automatically sets a plane's flight path.

Arlene Salac, FAA spokesperson, agreed that aviation officials have done just about all they can with planes that do not use FMS technology. But she said there is room for improvement regarding the planes flying with the new technology.

"It looks like we've taken it as far as we can at this point," Salac said. "If there are any further suggestions, we'll look at that."

Despite the high technology behind FMS planes, they have consistently been veering off track and flying right over the South End since the summer, according to the coalition.

And the high-tech planes only account for about 25 percent of the departures from Runway 27, he added.

Even though airport officials say they are doing the best they can, the citizens council will continue to meet with them quarterly regarding flight track monitoring. Plus, it's a particularly important issue with Massport making its big push for the construction of Runway 14/32.

Massport will present its proposal for the controversial runway at the Airport Review Committee meeting on February 11 at the State Transportation Building, 10 Park Plaza, conference rooms two and three, from 6 p.m. to 10 a.m.

Runway 14/32 is a uni-directional runway that would serve commuter aircraft. Its skeleton lies underground at the airport. Massport — the state agency that oversees Logan — began construction on the runway more than 20 years ago, but a court order halted the project, following massive opposition from East Boston residents.

The project makes community members from Br [illegible] eighborhoods and outlying towns [illegible] icious of Massport. Many, including [illegible] an, say the new [illegible] result in increased use for Runway 27 and many other runways. In short, city neighborhoods like the South End, South Boston, Roxbury, Jamaica Plain and East Boston to name a few, will hear a lot more jet noise.

"I don't think we should let them off the hook," said Walter, regarding the airport officials' cop out at last Monday's meeting. "Especially with Runway 14/32, it will be a complete disaster a decade from now."

The citizens advisory council will try to increase its political pressure, Walter added.

As for next Thursday's meeting, Walter said he's prepared to hear Massport's "song and dance" about how great Runway 14/32 will be for Logan and the city. Peter Blute, who heads Massport, will present projected figures regarding increases of runway use to the Airport Review Committee, which consists of residents and business leaders.

Many neighborhood activists have written off Runway 14/32 as a done deal. Four days after Blute's presentation, the proposal will be filed with the state environmental protection agency, Walter said.

Letter 174
Ann Hershfang
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
174.1	Environmental Review Process	MEPA	This letter requests your office to reject Massport's inadequate Draft Environmental Impact Statement on proposed Runway 14/32....	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.
174.2	Regional Transportation	Regional Airports	A new DEIS should fully describe benefits from alternative actions, such as diversion to Hanscom Field and other regional airports.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives.

Code	Topic 1	Topic 2	Comment	Response
174.3	Alternatives	Peak Period Pricing	A new DEIS should fully describe benefits from alternative actions, such as gains from peak hour pricing based on a reasonable threshold (115 flights is too high).	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. PPP is not recommended for implementation at this time because airline overscheduling is not a major contributor to current delays at Logan Airport. However, as a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary market signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport. Delays occur when wind or weather conditions require the use of configurations with fewer than three active runways, when poor weather requires increased separation distances between aircraft, or when airlines schedule more flights than Logan Airport can handle. The Airside Project is designed to reduce delays at Logan Airport from adverse winds and taxiway congestion.
174.4	Regional Transportation	Passenger Rail	A new DEIS should fully describe benefits from alternative actions, such as the high-speed Boston-New York rail service which begins this fall.	Massport's analysis of regional alternatives is comprehensive and reflects all the major recommendations of various regional planning studies that have been conducted over the last decade. These include expansion of the regional airports and development of high-speed rail in the Boston-New York market.
174.5	Regional Transportation	Regional Airports	A new DEIS should fully describe benefits from alternative actions, such as a second-major airport, starting from the recommendations in the Massachusetts Aeronautic Commission report.	A second major airport is not a solution to the current delay and congestion problems at Logan Airport. The Proposed Project to reduce delay and enhance safety at Logan Airport must be implemented in the near term to address current and future operating conditions. Even if a second major airport were to be pursued, the planning period for site selection and environmental review would require ten to 15 years, in addition to a multi-year construction period. Rather, Logan Airport is part of a regional system of airports that includes the T.F. Green/Providence, the Manchester, and the Worcester Regional airports. Service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
174.6	Alternatives	Peak Period Pricing	[Massport should analyze peak hour pricing more in depth.]	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR contain an analysis of PPP as a demand management alternative at Logan Airport. PPP is not recommended for implementation at this time because airline overscheduling is not a major contributor to current delays at Logan Airport. However, as a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary market signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
174.7	Noise	Impacts	[The EIS noise contours should be made more clear.]	Comment noted. The figures in the Supplemental DEIS/FEIR have been significantly improved since earlier drafts.
174.8	Noise	Model	Massport's computer calculations in the DEIS consistently understate noise compared to that measured by microphones in the field.	Refer to the new graphics in Chapters 4, 5 and 6 of the Supplemental DEIS/FEIR.
174.9	Noise	Hushkitted Aircraft	In 2000, the airline fleet is required to be 100% Stage III compliant. Noise benefits of 100% Stage III equipment should be calculated first, then the impact of Runway 14/32.	Comparisons of the Action Alternatives to the No Action Alternatives for individual fleet scenarios are the appropriate basis for evaluation and are not distorted. Fleet composition within each individual forecast scenario remains consistent. The phase-out of Stage 2 aircraft will reduce the noise impacts from Logan Airport, producing benefits to surrounding communities. These impacts are discussed in the *Logan Airport 1999 ESPR* (previously GEIR). The 29 M Low Fleet scenario includes 22 daily operations in Stage 2 aircraft (depending on the alternative examined), which represent about 2.5 percent of the total daily jet operations in that fleet. (Refer to Table 6.2-1 of the Supplemental DEIS/FEIR). In the shift to a post-1999, 100 percent Stage 3 fleet, some of these aircraft would likely have received hushkits resulting in very little improvement in the noise of individual overflights (and hence, little improvement in DNL), and some were likely converted to Stage 3 airplanes. However, on balance, the total number of Stage 2 operations in 1999 is small, and a revised 29 M Low Fleet scenario would leave a significant number of hushkitted airplanes to dominate the exposure. For these reasons, it is estimated that the presence of the Stage 2 airplanes in the 29 M Low Fleet scenario overstates noise exposure by only a few tenths of a dB, which does not represent a material difference.

Code	Topic 1	Topic 2	Comment	Response
174.10	Environmental Justice	Impacts	The equity of locating airport noise pollution in the Commonwealth's poorest neighborhoods deserves more than four pages out of four volumes. Massport's unsupported conclusion that low-income communities do not receive a disproportionate impact requires further explanation.	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the Final United States Department of Transportation Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.
174.11	Delay	Model	[The delay model is not satisfactory.]	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. Chapter 1 and Appendix C include a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
174.12	Noise	PRAS	FAA's tower has not effectively used the Preferential Runway Assignment System to share the noise burden.	The Supplemental DEIS/FEIR projects that the Preferred Alternative would promote runway use in a manner that is more consistent with annual PRAS goals. The total number of departures from Runway 27 (over South Boston, Roxbury, and Jamaica Plain) would increase, but the number of equivalent jet operations would remain essentially the same. The difference in these communities would be fewer nighttime operations and more daytime operations but the same noise impacts. Total departures from Runway 33L and arrivals to Runway 15R (over East Boston and Chelsea) would increase, but most of these are non-jets. These runway operations are currently running well below the PRAS goals, and the unidirectional Runway 14/32 would allow the controllers to approach, but still remain below the annual goals for these operations. Additionally, by increasing the number of operations over water, Runway 14/32 would reduce the total annual hours of dwell and persistence over populated areas in accordance with short-term PRAS goals.

COMMENT PROCEDURE for: Draft Logan Airside Improvements (a.k.a. Runway 14/32) **EOEA #10458**

All comments on EIRs (environmental impact report) must refer to the EOEA file number. There may be other identifying numbers, but the EOEA file number is the one which must be used.

LETTER 175

Comments not referring to the EOEA file number may not be considered.

All comments must be received April 22, 1999

All mail concerning the environmental impact review process including filings, comments, and all associated materials must be addressed to:

Bob Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Arthur Pugsley EOEA No. #10458
100 Cambridge Street - 20th Floor
Boston, MA 02202

Failure to address mail in this manner may result in delay of action on comments or no action on comments at all.

Dear Mr. Durand,

My comments to the EIR-Logan Airside Improvements Plan EOEA #10458 are as follows:

The EIS/EIR does not address the problem of ground airlap because there is not sufficient public transportation to accommodate the air traffic they expect to come to Boston. 175.1

This is a short term solution. With in 10 years we will face the same issues.

Name Christine A. O'Toole
Address 3 Greenough Park
Boston MA 02150
Phone 6178222343

Letter 175
Christine A. O'Toole
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
175.1	Ground Transportation	Access to Logan	The EIS/EIR does not address the problem of ground delays because there is not sufficient public transportation to accommodate the air traffic they expect to come to Boston.	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Annual Updates (Environmental Data Reports).

Darryl Pomicter

136 Myrtle Street
Boston, MA 02114-4403
Phone/Fax: 617 227-1153
E-mail: dpomic@aol.com

LETTER 176

April 22, 1999

Bob Durand, Secretary
Executive Office of Environmental Affairs, Attention MEPA Office
Arthur Pugsley, IV, EOEA No. 10458
Commonwealth of Massachusetts
100 Cambridge Street, 20th Floor
Boston, MA 02202

RE: Logan Airside Improvement Planning Project, DEIR/DEIR

Dear Secretary Durand:

As the Beacon Hill Civic Association representative to the CAC and the ARC my basic opposition to Massport's proposal to construct a new runway at Logan Airport is stated in the letter of opposition from the Beacon Hill Civic Association.

This letter expresses additional opposition based on Massport's inconsistent, unbalanced, and misleading presentation of information. My comments are based on my experience, which also includes on the Technical Subcommittee of the ARC (which included an additional series of technical meetings with Massport and their consultants); in the Boston Redevelopment Authority's Boston Central Artery Depression Feasibility Study in 1974-75 (as Beacon Hill representative); doing business around the world for many years; and as an MIT trained engineer.

Massport has presented overwhelming amounts of information, formally and informally. While most of the volumes of information and their comments are factually accurate, much of their presentation of information in print and verbally is inconsistent, misleading, and deceptive--misinformation. Many normal people are overwhelmed by the information and feel they must agree with the "facts". Despite the quantity, the information is often incomplete and improperly presented; and their conclusions are consequently defective.

Massport's presentation of information, in print and verbally, mixes operations and passengers, quantities and percentages—presenting what at that point is most favorable and omitting what at that point is unfavorable. They should consistently present operations and passengers figures with both quantities and percentages, including subtotals and totals. A few examples: 176.1

1. At the State House hearing March 23, Director Blute talked about "70,000 planes a year using the new runway will be moved over the water." In the next sentences he talked about "the few percent of increased traffic over some communities will more closely match the PRAS percentages agreed to by all the communities." Those 70,000 operations over the water are about 15% of total operations at Logan. Those few percent of flights moved to other neighborhoods includes more than 40,000 operations from Runway 27, more than 30,000 from Runway 33, and more than 10,000 from Runway 22. Since neighborhoods are typically affected by more than one runway, the moved flights increase flights over some neighborhoods by 50-70,000—more than triple current levels. (And, when the PRAS

percentages were formulated in the early eighties, no one agreed to current levels of traffic—increased by 112% over the last 20 years—much less Massport's intended continued increase without limit over time.)

2. At the same hearing, Director Blute threatened that, if the new runway is not built, traffic will still increase and the primary runways will be used for more than 90% of operations to try to satisfy the demand with the least delays. Of course, with the new runway, traffic is still intended to increase without limits; and the primary runways will still be used excessively. It will just take longer for the excess to grow. (No consideration is given to limits on operations, maximum capacity.)

3. Logan's airport ranking as the 11th in the US in operations and the 6th in delays has been widely stated as justification for the new runway to improve the delay ranking. At our February CAC and ARC meetings we noted to Director Blute that the additional ranking of 17th busiest in passengers indicated a lower than average number of passengers on each plane. Getting more people on each plane could also improve the ranking, since the same number of passengers on fewer planes should have fewer delays. At the State House hearing, Director Blute upped the ante by arguing that 17th in passengers while 5th in delays further emphasized the need for the new runway to decrease delays. (No mention was made of the operations 11th ranking or the alternative of getting more passengers on each plane.)

4. Massport details the worsening in rank from eighth in 1990 to sixth in 1997 in their recent DEIS/DEIR (page 1-13), and they note the FAA figure for 1997 of 25.2 delays per 1,000 operations (2½%) (page 1-11). They exclude the FAA delay figures for prior years which have dropped steadily from a peak of 39.23 (under 4%) in 1992 (www.ASC.FAA.GOV). More complete detail was included in their 1995 Airside Improvements Feasibility Study (page I-4), different from the current FAA figures, with usually worse delays but better rankings for the same years. (No ranking adjustment "handicap" is made in any case for inherently worse-than-average New England weather or for the constrained urban location, which may slow airport operations but should speed arrival to urban destinations.)

5. Massport's recent, widely delivered presentations state strongly that the new runway "Significantly Reduces Delays: 20-25% Annually, 45-55% in Good Weather (VFR), and Up to 90% on Northwest wind days." Their 1995 Airside Improvements Feasibility Study estimated that delays were then 80-100,000 hours for the year (page I-4). They forecast 200,000 hours of delay for 1999 and estimated that Runway 14/32 "could reduce delays by approximately 21,000 hours per year", for a 10% reduction (pages V-23 & V-24). Massport's 1997 Annual Update only mentions delays in connection with the Airside Improvements Project (page 3-2)—there is no detail. Their recent DEIS/DEIR estimates "121,000 annual hours of delay in 1998" (page 1-11), separately adds 22,000 hours for taxiway delays for a 143,000 hours total, and updates their 1999 estimates to 136,000-190,000 annual runway delay hours (page 4-33). It also notes approximately 159,000 hours total (135,000 for runways and 24,000 for taxiways) modeled aircraft delay in the 1993 base year (page 4-28). Much of the delay estimates add the runway and taxiway delays together, and much of the benefits estimates combine the Runway 14/32 and Reduced Landing Minimums. However, the difference in runway related delay between "All Actions" and "All Actions except Runway 14/32" is still 20,000 hours for the likely 1999 scenario (page 4-33)—a 16% reduction—and a 22% reduction for the likely future

scenarios. And the FAA's calculations for Logan delays are substantially lower than Massport's estimates. (Under which shell is the pea, which card covers the Queen?)

6. Massport estimated "annual savings of over $65,000,000 may be realized" in their 1995 Airside Feasibility Study, calculating 21,000 delay hours with a $3,100 operational cost per hour (page V-24). Separately, the $3,100 per hour was divided into $900 operating costs of aircraft to the airlines and approximately $2,200 travelers' costs of delay (page I-6). In their recent DEIS/DEIR, the airline cost per hour of delay (considering the Logan fleet mix) is estimated at $1,115; and the time of the average 53 passengers per aircraft is valued at $27 per hour for an average economic cost to passengers of $1,431—and a total value per hour of $2,546. The most likely 20,000 hours estimated to be saved in 1999 now has a decreased $51 million value. (No value is ever put on the negative affects on others—no decreased property value, decreased ability to business, or decreased ability to enjoy life. This can be quickly estimated at 4 hours/day x 5 days/week x 50 weeks/year = 1,000 hours/year/person affected. Valuing diminished ability to work or relax at several dollars per hour for a minimum 500,000 people affected quickly totals more than $1,000,000,000—dwarfing the delay costs side of the full equation. (A recently added $25 million estimate to construct the new runway excludes the cost to demolish and replace existing cargo facilities or to relocate those businesses.)

7. Asked about developing Hanscom, Massport responds that Hanscom is being developed as a reliever airport for general aviation (rather than as a regional airport for commercial passenger and cargo aviation). They note that it already has more operations than Portland, Maine and even their very brief mention of Hanscom in the DEIS/DEIR notes that it ranks second in operations among New England airports, behind Logan (page 2-41). Massport's 1997 Annual Report (page 4-9) notes that 85% (160,000) of the 188,000 annual operations at Hanscom are single-engine piston aircraft and that 41% (77,000) of the operations are touch-and-go flight training operations with single-engine piston aircraft; but Massport does not include this detail in their DEIS/DEIR or verbally. Or that Hanscom, the former US Air Force facility with existing 8,000 and 5,000 foot runways (and now owned and managed by Massport), has unused capacity for 50,000 or substantially more operations—even with the touch-and-gos. (The absence of commercial passenger and cargo operations at Hanscom—located in the middle of more than 50% of the passengers using Logan—both presently and in planning, is not addressed.)

We hope and trust for your actions to deny Massport's current proposal with direction to provide more technically consistent, complete, current, and less biased information. A longer range study and proposal is needed, which more fairly evaluates the positive and negative impacts of facilitating air traffic while respecting the health and wellbeing of all of those affected and of our environment—before any additional expansion of operations is allowed. 176.2

Thank you for your efforts.

Sincerely,

cc: CAC

Letter 176
Darryl Pomicter
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
176.1	Analysis Assumptions	Passenger Forecasts	Massport's presentation of information, in print and verbally, mixes operations and passengers, quantities and percentages-presenting what at that point is most favorable and omitting what at that point is unfavorable. They should consistently present operations and passengers figures with both quantities and percentages, including subtotals and totals.	The Airside Project involves a substantial amount of technical analysis and data. In public presentations Massport has sought to simplify the presentation of results in order to focus non-technical audiences on major conclusions and summary points. However, all of the technical analysis and data is contained in the environmental documents. Please refer to the main volume and the technical appendices of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR.
176.2	Alternatives	Other Non-Construction Alternatives	A longer range study and proposal is needed, which more fairly evaluates the positive and negative impacts of facilitating air traffic while respecting the health and well being of all of those affected and of our environment before any additional expansion of operations is allowed.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the *Logan Airport ESPR* (previously GEIR) and its updates.

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Cc:
Bcc: Arthur Pugsley@MEPA@EOEA
From: <Beverlysky@aol.com>
bject: Logan Airport Expansion, bad for Boston, bad for business
te: Tuesday, April 20, 1999 13:14:46 EDT
cach:
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

LETTER 177

Mr. Robert Durand, Secretary
MEPA Unit - Executive Office of Environmental Affairs
Attention: Arthur Pugsley, File # 10458 EOA
100 Cambridge Street 20th Floor
Boston, MA 02202

Dear Mr. Durand,

I strongly object to any expansion of Logan Airport runways. I am offended by Massports TV advertisements promoting this expansion. 177.1

Look to the sky as Massports plans for building the new Runway 14/32 will bring 60,000 more planes a year flying over our neighborhoods. By their own data Massport expects a 300% increase in flights!

ttended the hearing at City Hall in the Council Chambers on March 2 at 0 PM opposing any operational expansion at Logan Airport. The chamber was packed with people, mostly from East Boston, Winthrop, Dorchester, Roxbury, Jamaica Plain, Somerville and the South End. I know that I am not the only person in the South End who cant sleep past six in the morning on Saturdays and Sundays in the summer. The planes start flying over every five minutes if the wind is coming from the southwest, and the southwest wind is the prevailing wind from the early spring through the fall. I keep my windows closed but it doesnt help. The windows start to rattle, and I start counting the planes. If I want to sit out on my deck I cant talk on the phone or to a neighbor without having to stop every few minutes as another big bird buzzes my house.
These planes sound like an endless parade of jackhammers. That isnt even the worst of it. These planes are like giant crop dusters filled with deisel fuel emissions, every five minutes! Take a deep breath. There is more. We homeowners in the SE have watched as our homes have doubled and tripled in value, and our tax rates to match. We are a designated historic Victorian neighborhood, a nice ten minute walk from the Statehouse and Boston Common. We are blessed with fabulous restaurants, a vibrant artists community, a great people mix of racial. cultural and economic diversity.
We are on a major flight path for planes taking off from Logan airport.
This is a no - brainer. Who wants to live under a flight path?
Developers will not advertise this feature in their brochures.
Real Estate agents, developers of Washington Street and other SE areas will have a difficult time selling luxury residences in a desirable neighborhood if they have to raise their voices to their customers as they cribe all the amenities. You cant hide noise pollution. Its noisy. pollution isnt so obvious, but it is more insidious. Air pollution causes heart and lung disease. We, residents of the South End will come

together to stop Massport from turning our neighborhood into the new East Boston. The good people of East Boston have been fighting this war for many years. A war to protect their quality of life from deteriorating any more than it already has. I was very impressed with how knowledgeable these citizens were about levels of organic and non-organic pollutants in the issions from airplane fuel exhaust. Articulate about all the beaurocratic ganizations that they must work with at federal, state, city and local vels. These were working class people who have read these ten year environmental impact reports that cost millions of dollars and are several inches thick and understand them! Massport interprets the end result of all of these studies as a directive to enlarge Logan airport. To quote one of the speakers, who had charts, graphs, maps, and bulleted points on the video screen Expansion of Logan airport will improve the quality of service at Logan. Of Course. It will be a good, short term solution for Logan. On the other hand it will be a short term and long term disaster for the people who live and work in Boston. The strongest point Massport wanted to make was how good for the economy, jobs and the convention center this new runway would be. Yes, the convention center promises thirteen thousand new jobs! Where will the people who get these jobs come from? Will they be living in the convention center or commuting? Sixty-thousand more planes a year! These are Massports projections so I assume they are a conservative estimate. These planes will need taxies, buses, cars in order to disgorge all these people into the tunnels, coming and going. They claimed at the meeting that the new runway will be unidirectional. Which direction will that be? Only for takeoffs? Only for landings? It doesnt matter. There are too many planes now. More planes are just that, more planes. If Massport builds it, yes, they will come.

The problem is where will we go? At the meeting Massport representatives talked about giving back to the communities. I didn't know this, but Massport has actually paid homeowners in East Boston to soundproof their homes from the noise! Talk about palliative Band-Aids. This works great if never want to go outside. They have built parks and baseball fields for kids in Eastie. Another bandaid. Would you want your kids running around a field as jumbo jets spew toxic emissions overhead? Would you want to sit in a park breathing in this stuff? Listening to the noise? Massport cannot pay us all off, build more parks, insulate our homes enough to make this problem of quality of life go away.

We are the endangered species here.

I suppose Massport could supply citizens of Boston with headsets and gas masks in the future, but I think this would be sending a distasteful message to all the tourists and conventioneers arriving in our fair town, unless they were all supplied with their own pollution kit as they emerge from their flight.

We want them to have a good experience after all.

The people of Boston and our legislators have fought to clean the harbor waters. One of the most beautiful harbors in the world, I think, rivaling San Francisco's.

This is a unique, priceless visual and economic resource in our city. Closed off to us by big buildings and expressways. Guess what the beautiful downtown greenbelt will be like after the elevated expressway is torn down. Prime Real estate turned into a flight path for noise and air contaminants.

Castle Island, in South Boston, is a spectacular place to view the harbor the Islands and the skyline. It is regretfully unbearable to spend any length of time there, especially in the mornings and evenings at peak take off and land times. You can almost touch the planes that take off and land every few minutes. It is impossible to have a conversation as the planes roar overhead, never mind the smell of exhaust fumes. Now we must take our battle to the

wont abdicate our Air Rights to Massport for the sake of the convention center, or for the sake of all these corporations and businesses that

Massport claims must have a major international airport right in the heart, at the very entrance to this city. No.

Travelers all over the world do not base their destinations on the proximity of the airport to the center of town. Think about this. London, Paris, Tokyo, Rome, New York all have international airports that are one or two (depending traffic conditions) hours from the heart of the city. Orly and Heathrow th have high speed rail transports. When was the last time you said to yourself Im not going to go to London because the airport is an hour or more outside of town!

Lets think Big. Get really creative. Think outside of the grid (lock).

Downsize Logan into an air commuter and Eastcoast flights only airport.

There are other solutions to expanding Runway 14/32.

The most profound speaker of the evening was a young man who looked like he was about ten or twelve years old from East Boston.

This is what he said;

The planes are noisy and wake me up at night so I cant sleep, they also smell real bad. Thats it in a nutshell. Plain speaking, common sense.

We in Boston are waking up from the noise and smelling the fumes.

Protect us. Protect our town from this assault on our health, our property values and the daily quality of our lives here in Boston.

Say no to Runway 14/32 once and for all.

Sincerely,

Beverly Sky
36 Upton Street
Boston, MA 02118

Letter 177
Beverly Sky
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
177.1	General Opposition		I strongly object to any expansion of Logan Airport runways.	Comment noted.

LETTER 178

April 22, 1999

FAA Office of Airports
800 Independence Avenue, SW
Washington, DC 20591
Room 600 East

Dear Madam or Sir:

I am writing to complain about the growing number of planes that take off directly over the city of Boston from Logan Airport. According to Massport officials, this noise is caused by the use of the runway configuration 33/27, which is used based on wind and other factors. This runway is often in use during the very early morning hours and late evening hours, since according to Massport officials its use during peak hours would cause too many delays at the airport. Planes are constantly departing directly over the central city, from 6:00am to 11:00pm. The situation has become unbearable. 178.1

After repeated calls to Massport over the past year, the situation continues to worsen.
The departure route is the most densely populated take-off routing from Logan, by far.
This routing is almost never used for arrivals. I have found that no matter the wind
condition, this configuration is often used. Based on reports that I have received from
Massport, this routing is used in various wind conditions. On Sunday, March 14, it was
also used in calm wind conditions. In addition, stage II aircraft are not allowed to land or 178.2
depart Logan before, 7:00am. This is not the case, as I have visually observed stage II
aircraft depart from as early as 6:15 am.

Massport and the FAA need to address these concerns and avoid disrupting the life of
Boston resident at the benefit of the more wealthy suburbs. It makes no logical sense to 178.3
have planes take off directly over the most densely populated area in the region,
especially at times when people are sleeping. Flights should be arranged to take off over
the ocean and over less populated areas. At the same time, Massport needs to find a
solution to overcrowding of the runways by finding an alternate site for airport 178.4
expansion, such as Hanscom Field, and not a new runway at Logan.

Thank you and best regards,

John Stewart.
34 Rutland Square
Boston, MA 02118

Letter 178
John Stewart
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
178.1	Noise	Runway Use	Planes are constantly departing directly over ... central [Boston], from 6:00 AM to 11:00 PM. The situation has become unbearable...and the situation continues to worsen. The departure route is the most densely populated take-off routing from Logan, by far. This routing is almost never used for arrivals.	Table 6.2-17 of the Supplemental DEIS/FEIR shows nighttime jet operations projected to increase from 144 in 1998, to as many as 231 under the No Action Alternative with the 2015 High Regional Jet Fleet. However, regardless of the fleet, many of the future night operations are the result of delays that will occur as demand at Logan Airport continues to increase. One of the direct benefits of the Preferred Alternative is that it will reduce these night operations by 32 to 43 flights depending on the fleet forecast, though *any* alternative to the No-Action scenario will help alleviate some of the projected delays. In addition, Massport is committed to exploring other measures to reduce nighttime noise whether or not the Preferred Alternative is implemented.
178.2	Noise	Nighttime Noise	Stage II aircraft are not allowed to land or depart Logan before, 7:00 AM. This is not the case as I have visually observed Stage II aircraft depart from as early as 6:15 AM.	By Federal regulation, as of December 31, 1999, Stage 2 airplanes weighing more than 75,000 pounds are no longer permitted to fly in the continental United States. There are, however, Stage 2 airplanes less than 75,000 pounds which the FAA still permits to operate. Thus, Massport continues to enforce its nighttime noise rules which apply universally to all weights of aircraft.
178.3	Noise	Nighttime Noise	It makes no ... sense to have planes take off directly over the most densely populated area in the region, especially at times when people are sleeping.	The preferential runway rules at Logan Airport have late night departures on Runway 16 over the harbor as the highest priority to minimize departures over highly populated neighborhoods. The Night Equivalent Sound Level (LeqN) was calculated at 23 selected locations for all fleets and scenarios. Tables 6.2.17 and 6.2.18 of the Supplemental DEIS/FEIR report these data for the 29M Low and 37.5M High Fleet scenarios of the Supplemental DEIS/FEIR. The results show that, at most locations, the LeqN for the future fleets is lower than for the 1993 case. Where there is an increase in LeqN, the reason was the increase in flights for the No Action Alternative, which generally was mitigated by the Preferred Alternative. These results indicate that there will be less sleep disturbance in the future than that currently experienced. Refer to Section 7.4 of the Supplemental DEIS/FEIR for a discussion of cumulative noise impacts.

Code	Topic 1	Topic 2	Comment	Response
178.4	Regional Transportation	Regional Airports	...Massport needs to find a solution to overcrowding of the runways by finding an alternative site for airport expansion, such as Hanscom Field and not a new runway at Logan.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR, specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established limits (60 seat regulation), Massport believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights and a significant number of passengers are travelling to Boston. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR) and its Annual Updates, and shall be considered by the Hanscom Area Town Selectmen (HATS). Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field.

from the desk of
VINCENT R. TINO

LETTER 179

March 29, 1999

Secretary of Environmental Affairs
Attention: MEPA Office
Mr. Arthur Pugsley – EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02202

Dear Mr. Pugsley:

Although I support social progress and economic growth for the Commonwealth, I believe 179.1
the addition of Runway 14/32 would only be a temporary solution to a long-term problem.
The lack of available land and buffer area poses many barriers to growth at Logan
International Airport. Therefore, I feel that a second airport would better serve the region. 179.2
To currently increase capacity, the airport should use its available configuration to more
efficiently move passengers. Therefore, private civil aviation and cargo operations should be
relocated to suburban airfields. Operations at Logan should cap annual Landing/Takeoff 179.3
operations (LTO) but strive to maximize passenger throughput with increased passenger-to-
LTO ratios. In addition, relocating regional air commuting to suburban airfields would help 179.4
to relieve delays.

With these concerns, I provide to you my comments on the Logan Airside Improvements Planning, Project, Volume I, Draft Environmental Impact Statement/Report (February 1999).

Chapter 6.3 discusses the air quality impacts associated with the proposed project. Section
6.3.1 discusses the methodology used in the air quality analysis. The methodology states that
the Logan Dispersion Modeling System (LDMS) was used to assess air quality impacts.
Although the methodology used appears to be technically sound, the analysis fails to follow 179.5
guidelines set forth by the both the U.S. Environmental Protection Agency (EPA) and the
Federal Aviation Administration (FAA) for air quality analyses. Appendix W of 40 CFR Part
51 lists the Emissions and Dispersion Modeling System (EDMS) as the preferred dispersion
model for airport air quality analyses. The Federal Register (dated April 13, 1998) states that
FAA policy (docket number 29194) requires the "use of EDMS to assess the air quality
impacts of proposed airport development projects." Although the analysis states that the
Massachusetts Department of Environmental Protection (DEP) and EPA Region I approve
of the LDMS, the FAA policy statement regarding EDMS is not addressed. Both references
are included for your review.

Section 6.3.1.2 discusses the inputs for the dispersion modeling analysis. The highest and most conservative concentrations found in any airport air quality analysis are usually found at the property boundary of the airfield. However, property boundary receptors are not included in this analysis. Although the included receptors were specifically selected by DEP, these receptor locations may fail to predict the most conservative concentrations, since the receptors are at points located a significant distance from the airport property. For an airport in such close proximity to residential neighborhoods, it is likely that maximum concentrations would occur at the property boundary and very close to residential neighborhoods. Thus, the maximum concentrations provided in Tables 6.3-10 through 6.3-14 may be underestimated and may fail to comply with National and State ambient air quality standards. 179.6

Section 6.3.2 presents the results of both the emissions inventory and dispersion modeling. Table 6.3-2 presents maximum background concentrations of carbon monoxide (CO), hydrocarbons (HC), nitrogen dioxide (NO_2), and particulate matter less than 10 microns in diameter (PM_{10}). Although Table 5.3-2 states that the second highest nearby annual 24-hour average PM_{10} concentration in 1995is found to be 52 micrograms per cubic meter (μg/m^3), Table 6.3-2 reports a value between 45-48 μg/m^3 be added as background. Similarly, the annual background PM_{10} concentration is shown to be 24 μg/m^3 (in Table 5.3-2, 1996) while the value added as background in Table 6.3-2 is shown to be 23 μg/m^3. Also, it appears that the unit conversion from background values in parts per million (ppm) to μg/m^3 has been performed inconsistently and with errors. The following table presents a summary of the calculations: 179.7

Pollutant	Averaging Time	Reported Second Highest Background		Implied Conversion Factor	Average AP-42 Conversion Factor	Corrected Second Highest Background
		ppm	μg/m^3	(μg/m^3)/ppm	(μg/m^3)/ppm	μg/m^3
CO	1-hour	7.7	4446	577	1140	8778
	8-hour	4.9	2262	462	1140	5586
NO_2	1-hour	0.09	173	1922	1880	169
	Annual	0.03	58	1933	1880	56

It is clearly shown that the conversion of CO and NO_2 from ppm to μg/m^3 has been performed with some inconsistency. Differences in the NO_2 factor could quite possibly be found in the assumptions of temperature and pressure. However, the discrepancies in conversion factors for CO are significantly different and discrepancies in the factors between pollutant averaging times should not occur. The conversion table from Appendix A of U.S.

EPA's Compilation of Air Pollution Emission Factors (AP-42) is also provided for your review.

It is unclear if background concentrations are included with the maximum concentrations presented in Tables 6.3-10 through 6.3-14. Table 6.3-2 presents maximum background annual NO_2 and PM_{10} concentrations of 53-58 $\mu g/m^3$ and 23 $\mu g/m^3$, respectively. Tables 6.3-10 through 6.3-14 present maximum total NO_2 and PM_{10} concentrations of 55 (or 56) and 24 $\mu g/m^3$, respectively. Firstly, the higher background concentration (in this case 58 $\mu g/m^3$) should be summed with the highest modeled concentration to produce the more conservative result. It appears that the lower background NO_2 concentration was added to the modeled value. Secondly, it appears that modeled annual concentrations of 3 $\mu g/m^3$ for NO_2 and 1 $\mu g/m^3$ for PM_{10} (inferred as the differences between background and total concentrations) are surprisingly low for airport air quality analyses and should be checked for errors.

Particulate emission factors for the majority of aircraft engines are generally unavailable. Only limited amounts of data for total suspended particulate (TSP), not PM_{10}, from a few older engines exist. Yet the analysis presents PM_{10} emissions from all sources, including aircraft. Therefore, either particulate emissions from aircraft where factors were unavailable were omitted, or significant assumptions relating to aircraft PM_{10} emissions were made. These assumptions would be capable of greatly varying the results of the analysis.

Based on my review, I suggest that both the Massachusetts Secretary of Environmental Affairs and the FAA Regional Manager of Environmental Programs review the above comments thoroughly before final approval of the proposed project is made.

Sincerely,

Vincent R. Tino

Vincent R. Tino

Enclosures (3)

Letter 179
Vincent R. Tino
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
179.1	Alternatives	Runway 14/32	...I believe the addition of Runway 14/32 would only be a temporary solution to a long-term problem.	The Airside Project analysis is based on alternative 20-year forecasts of operations by aircraft type. Only larger aircraft compatible with the existing facilities at Logan Airport are included in the future forecasts for Logan Airport fleets on which the delay and environmental analyses are based. Because the development of a second major airport would require ten to 15 years for site selection and environmental review in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Service developments at other surrounding airports, including Manchester, T.F. Green/Providence and Worcester Regional airports, preclude the need for a second major airport.
179.2	Regional Transportation	Regional Airports	...a second airport would better serve the region.	Because the development of a second major airport would require ten to 15 years for site selection and environmental review in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Service developments at other surrounding airports, including Manchester, T.F. Green/Providence and Worcester Regional airports, preclude the need for a second major airport.
179.3	Regional Transportation	Regional Airports	...private civil aviation and cargo operations should be relocated to suburban airfields.	Massport has no jurisdiction over the development, operation or use of infrastructure at airports other than Logan Airport, Hanscom Field, and Worcester Regional Airport (as of January 15, 2000). Massport plays no role, however, in the decisions of private airlines regarding air service routes or service levels. As proprietor of Logan Airport, Massport's primary responsibility is to supply, operate, and maintain Logan Airport's infrastructure which includes the runways, taxiways, terminal buildings, parking facilities and access roads. As a recipient of federal airport grants, Massport must adhere to grant covenants that require it to operate Logan Airport in such a way so as to ensure access and availability for public use on fair and reasonable terms and without unjust discrimination.
179.4	Alternatives	Other Non-Construction Alternatives	Operations at Logan should cap annual Landing/Takeoff operations (LTO) but strive to maximize passenger throughput with increased passenger-to-LTO ratios.	The Airside Project will not change Logan Airport's airfield capacity of approximately 120 aircraft operations per hour. Regarding caps on airport operations, federal constitutional provisions (preemption, commerce clauses, equal protection), federal aviation statutes and regulations, and contractual provisions related to covenants in connection with the Federal Airport Improvement Program grants which Massport receives, restrict Massport's ability to control the number of aircraft operations at Logan Airport. Massport has undertaken a comprehensive mitigation program, such as Logan Airport Noise Rules, for those areas that fall within its powers as proprietor of Logan Airport, which are not preempted under federal law.

Code	Topic 1	Topic 2	Comment	Response
179.5	Analysis Assumption	Air Quality	...the Logan Dispersion Modeling System (LDMS) was used to assess air quality impacts. Although the methodology used appears to be technically sound, the analysis fails to follow guidelines set forth by the both the U.S. Environmental Protection Agency (EPA) and the Federal Aviation Administration (FAA) for air quality analyses.	The dispersion model portion of the LDMS is an EPA-approved model. The methodology is consistent with FAA and EPA guidelines.
179.6	Air Quality	NAAQS	Thus, the maximum concentration provided in Tables 6.3-10 through 6.3-14 may be underestimated any may fail to comply with National and State ambient air quality standards.	The model and methods used to develop these data were based on EPA- and DEP-approved guidelines and show that the NAAQS will not be violated.
179.7	Air Quality	Model	[There are inconsistencies that need to be either explained or corrected in Section 6.3.2 of the DEIR/DEIS air quality analysis.]	The model and methods used to develop these data were based on EPA- and DEP-approved guidelines and show that the NAAQS will not be violated.

LETTER 180

Mark E. Warren
Attorney
174 Princeton Street, E. Boston
mail: P.O. Box 6146
Boston, MA 02209-6146

Telephone (617)569-6581

April 16, 1999

Secretary of Environmental Affairs
Logan Draft EIR
Attention MEPA Office
Mr. Arthur Pugsley – EOEA No. 10458
100 Cambridge Street, 20th Floor
Boston, Massachusetts 02205

Dear Mr. Pugsley:

After reviewing Draft Environmental Impact Statement/Report submitted by the Massachusetts Port Authority I am left with the impression that it is little more than carefully directed obfuscation. The objective of Massport is the expansion of Logan Airport's landing capacity. The draft document states the agency's justification for this goal without sufficient consideration of the negative environmental consequences or serious consideration of alternatives. The confused logic of Massport does not support the expansion of a poorly located facility at the expense of its already disadvantaged neighbors.

The report does not adequately consider which segment of the population will bear the most serious adverse consequences of airport expansion. The addition of Runway 14/32 and the centerfield taxiway will have a disproportionate negative impact on minority and low-income neighbors of Logan Airport. Property owned by people in lower socio-economic groups will face reduced property values to increased aircraft noise. 180.1

In the area where I reside, for example, the East Boston and Chelsea communities, these people tend to be recent Hispanic immigrants. The report is silent on why these people must face lowered property values while residents of the communities surrounding Hanscom Airport are not confronted by, or seriously considered for, proportionate losses.

While the draft report ignores the weaker neighbors of Logan International Airport, it also fails to adequately consider a very powerful and persistent neighbor. More powerful than the opposition any human opponent may muster is the might of the North Atlantic. As one looks at a map, located just to the right of Logan is the weather engine that is responsible for the flight delays Massport now seeks to appease by runway expansion. Weather happens. No rational amount of expansion will abate the weather delays caused by the proximity of Logan Airport to the North Atlantic. Inland alternatives

Letter 180
Mark C. Warren, Esq.
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
180.1	Environmental Justice	Impacts	The addition of Runway 14/32 and the centerfield taxiway will have a disproportionate negative impact on minority and low-income neighbors of Logan Airport. Property owned by people in lower socioeconomic groups will face reduced property values due to increased aircraft noise.	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the Final United States Department of Transportation Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.

LETTER 181

Cc:
cc: Arthur Pugsley@MEPA@EOEA
om: "White, Barbara A." <BAWHITE@PARTNERS.ORG>
oject: 14/32
ate: Monday, April 19, 1999 12:39:09 EDT
Attach:
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

Mr. Pugsley,

As a new resident to the City of Boston (SouthEnd), I am very surprised at the amount of airplane noise that is already present in this location. Increasing this three-fold by building runway 14/32, will add considerable discomfort and truly have a very negative effect on our lives here. 181.1

Boston's reputation as a livable city has caused its real estate to skyrocket. Gentrification has beautified this area and increased property values to an incredibly high level. Business, tourism and ultimately money has come to this city because it is one of the most beautiful cities in the US. Building a new runway can deteriorate this growth.

ery major city in the US is served by two airports. All of these airports are at a distance (1 hour) from the heart of the city. Other than Logan, Providence and Worcester airports, already built and not maximized, should be the 2nd and 3rd major airports for the City of Boston.

Spend the effort on improving transportation between these cities and Boston, and every person who lives in Massachusetts and every business that wants to relocate or do business anywhere in the state, will have superior and quick access to air transportation. 181.2

Thank you,
Barbara A. White
bawhite@partners.org

Letter 181
Barbara A. White
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
181.1	Noise	Impacts	As a new resident to the City of Boston (South End),I am very surprised at the amount of airplane noise that is already present in this location. Increasing this three-fold by building runway 14/32, will add considerable discomfort and truly have a very negative effect on our lives here.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.
181.2	Regional Transportation	Regional Airports	Spend the effort on improving transportation between ...[Providence, Worcester] and Boston, and every person who lives in Massachusetts and every business that wants to relocate or do business anywhere in the state, will have superior and quick access to air transportation.	MassHighway is preparing a Draft EIS/EIR an improved access to Worcester Regional Airport.

4 Rutland Square
Boston, MA 02118-3106
April 20, 1999

Arthur Pugsley
Executive Office of Environmental Affairs
100 Cambridge St
Boston, MA 02202

Dear Mr. Pugsley,

I am not in a position to evaluate the health problems that would result from the construction of Runway 14/32, although I understand that incidence of respiratory diseases is already abnormally high in areas affected by Logan flights. I would like to comment, however, on the effect of noise pollution in the neighborhood where I live. The South End is an historically unique neighborhood, and one of those delightful downtown residential neighborhoods which give Boston its special character and must be the envy of cities affected by inner city blight. A friend living on Union Park, certainly one of Boston's finest residential squares, has already sold her condo finding present noise levels from low-flying jets intolerable. The mere possibility of a tripled flights has discouraged me from building a roof deck to take advantage of the commanding view. My understanding is that support for the proposed runway is to be found mainly in the business world. I pay more than $7000 annually in real estate taxes, roughly 10% of my income, and make minimal demands on public services. I would not be willing to do so if there were a substantial increase in flight noise. The business community might find their enthusiasm for the runway waning if the tax basis eroded and their well-heeled clientele sought peace and quiet elsewhere. 182.1

Sincerely,

Robert Wynne

Robert Wynne

Letter 182
Robert Wynne
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
182.1	Noise	Impacts	[The proposed project will have unacceptable cumulative noise impacts on Boston's South End neighborhood.]	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.

LETTER 183

Edwina Yezierski
310 Columbus Avenue
Boston, MA 02116
617-536-3509

April 20, 1999

Mr. Arthur Pugsley
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

ATTENTION: MEPA Office

Re: Proposed Runway 14/32 - Logan Airport

Dear Mr. Pugsley:

I am concerned about the effect of the proposed new Runway 14/32 on the entire Boston area as well as the South End. Regardless of a new runway, and according to Massport's own projections, demand for passengers and aircraft to come to the area is expected to grow significantly, and flight delays are expected to soar. As a physically small inner-city airport, Logan has exceeded reasonable capacity and cannot handle the dramatic projected demand without putting Boston, the Harbor and surrounding communities in **extreme danger**, 183.1

The City of Boston and the South End neighborhoods have worked very hard over the last 15 years to bring back the South End and make it a desirable neighborhood once again. When I moved there 15 years ago there was little, if any, air traffic noise. Now it is almost constant. At times, it sounds like a war zone. I must say that now being aware of this, I would not again buy in the South End and I am sorry to say that I am hearing other people express the same feelings about living in downtown Boston area which is, indeed, a shame. In addition to the noise pollution, there is also the air pollution to consider.

Please know that I support economic growth for Boston. Communities are working with Senator Travaglini, Congressman Capuano, Congressman Markey, Representative O'Flaherty, Representative DeLeo and others in support of potential solutions to the regional air transportation problem, such as secondary airports, etc. We need you on our side. There are

answers to the problem which could bring economic benefit outside of Boston without increasing capacity at Logan which is not the answer. To increase capacity at Logan would be severely detrimental to those of us who call the Boston area home and, ironically, to those visitors 183.2
expected to fly here as well. Our health and safety are already at great risk. Our noise and air pollution has increased each year and we cannot accept more.

Your attention to this serious issue is needed. I urge you to meet with the group of city officials and community leaders in opposition to the new Logan runway to hear the concerns of the residents regarding our health and the environmental impact of this proposal. There are serious questions regarding the adequacy, quality and reliability of information supplied by Massport. I ask you to understand that the quality of life of the Boston area residents is threatened. Thank you for your anticipated attention to this request.

Sincerely,

Edwina Yezierski

Letter 183
Edwina Yezierski
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
183.1	Alternatives	Preferred Alternative	As a physically small inner-city airport, Logan has exceeded reasonable capacity and cannot handle the dramatic projected demand without putting Boston, the Harbor and surrounding communities in extreme danger.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the *Logan Airport ESPR* and its updates.
183.2	Alternatives	Preferred Alternative	To increase capacity at Logan would be severely detrimental to those of us who call the Boston area home and, ironically, to those visitors expected to fly here as well.	The goals of the Airside Project are to reduce delay, increase the airport's efficiency, and improve airfield safety in an environmentally responsible manner. The construction of unidirectional Runway 14/32 would prevent the significant drop in airfield capacity that now occurs during northwest wind conditions. The runway would not increase Logan Airport's normal operating capacity of approximately 120 operations per hour which is available nearly 80 percent of the year, but rather would allow this capacity to be maintained more consistently.

LETTER 184

Edwina Yezierski
310 Columbus Avenue
Boston, MA 02116
617-536-3509

April 26, 1999

Mr. Arthur Pugsley
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

ATTENTION: MEPA Office

Re: Proposed Runway 14/32 - Logan Airport

Dear Mr. Pugsley:

Enclosed is a copy of a recommended solution to the proposed Runway 14/32 issue which was presented by Michael S. Dukakis and appeared in the Boston Sunday Globe on April 25, 1999. 184.1

I feel this is an excellent article and his suggestions should be seriously considered and implemented as a permanent solution to transportation needs of the City of Boston. 184.2

Thank you for your attention to this matter.

Sincerely,

Edwina Yezierski

Common sense can solve Logan's problems

MICHAEL S. DUKAKIS

I thought Anna DiFronzo and a group of outraged East Boston residents had buried the plan for a new runway at Logan Airport forever back in the 1970s.

Unfortunately, like Godzilla, it's back – and this time it makes even less sense than it did 25 years ago.

Why? Because it is a very short-term solution to what is a long-term problem that won't be solved by putting another runway in Boston Harbor. That problem can be solved by using three important tools that are now available to us.

The first is Amtrak's new high-speed Acela express service, which begins this fall – 10 trains a day between Boston and Washington that will carry thousands of former shuttle sufferers quickly and easily from Boston to New York in three hours, downtown to downtown. No more metal detectors. No more fuming at delays in the airport and on the runway. No more $30, one-hour cab rides from LaGuardia into downtown New York.

And if you happen to live west of Boston, you can forget about fighting your way through the tunnels to Logan and a $16-a-day parking tab. A new Amtrak station with 2,000 parking spaces will be waiting for you at Route 128.

The second is not one, not two, but three regional airports, each close to an older urban community that wants and needs growth. Manchester, N.H., Worcester, and Providence are all within easy driving or rail commuting distance of thousands of Logan users who can be better served by these airports. Providence is already connected to Boston by road and rail, and a new station stop at T. F. Green Airport will be just minutes by a moving sidewalk from the terminal.

The Massachusetts Turnpike Authority should get cracking on a spur from the turnpike to the Worcester Airport, which is just a few minutes' shuttle ride from the magnificently restored Worcester railroad station. New Hampshire already plans to build a new highway connection to the Manchester Airport, and it wouldn't take much to extend existing commuter rail lines there as well.

Finally, some simple management steps at Logan would open up even more capacity for the longer flights that Logan is uniquely equipped to provide. We tried one – peak pricing for small aircraft – in the 1980s with spectacular success.

In fact, Logan went almost overnight from 18th to 2d among the nation's major airports in on-time performance. Unfortunately, the small-plane lobby went to work on the Reagan administration, and we were ordered to revoke our landing-fee plan. But there is absolutely no reason why puddle jumpers should be taking up valuable airspace during some of Logan's busiest hours. Peak pricing requires them to adjust around those hours, and there are plenty of smaller airports in addition to Manchester, Worcester, and Providence that can accommodate them as well.

Mayor Menino had the good sense to call for a commission to study the subject. Governor Cellucci should call a summit meeting of his fellow governors from New Hampshire and Rhode Island and the mayors of the four key cities that are involved. They should each bring their top transportation planners with them. Stan Bagley, a Massachusetts native and the chief of Amtrak's Northeast division, should join them. In a matter of months they could put together a plan that would dwarf the piddling contribution that a new runway would make to the problem.

Then we could bury this misbegotten proposal once and for all with appropriate ceremonies and pronounce a final benediction over it.

Rest in peace.

Michael S. Dukakis, former governor of Massachusetts, is a professor of political science at Northeastern University and vice chairman of the Amtrak Reform Board.

JOHN OVERMYER ILLUSTRATION

Letter 184
Edwina Yezierski
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
184.1	Alternatives	Peak Period Pricing/Regional Airports/Passenger Rail	[Instead of the proposed project, Massport should pursue use of Amtrak high speed rail; the regional airports at Worcester, Manchester, and Providence; and peak period pricing.]	Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.
184.2	Regional Transportation	Regional Airports/ Passenger Rail	Governor Cellucci should call a summit meeting of his fellow governors from New Hampshire and Rhode Island and the mayors of the four key cities that are involved. They should each bring their top transportation planners with them...In a matter of months they could put together a plan that would dwarf the piddling contribution that a new runway would make to the problem.	In November 1999, Massport and Governor Cellucci co-sponsored a Regional Transportation Summit of the New England Governors and transportation officials. The Summit focused on joint marketing among the New England commercial service airports and the joint promotion of rail and road initiatives that will foster an efficient and balanced regional transportation system. Refer to Section 2.2 of the Supplemental DEIS/FEIR for a comprehensive discussion of Massport's regional transportation planning initiatives.

4/11/99 LETTER 185

"OPPOSED TO RUNWAY 14/32"

Dear Mr. Pugsley,

Haven't Bostonians endured enough expansion, noise, traffic and general upheaval with "The Big Dig"?

Why not wait until that project is finished before deciding if we can and need to expand our airport?

Please oppose the proposed new runway at Logan airport! 185.1

Sincerely

Verna [illegible]

Letter 185
Verna Ferne
Private Citizens: Boston

Code	Topic 1	Topic 2	Comment	Response
185.1	General Opposition		Please oppose the proposed new runway at Logan Airport!	Comment noted.

LETTER 186

NAME:
STREET:
CITY:
DATE:

Arthur Pugsley
Executive Officer of Environmental Affairs
100 Cambridge Street
Boston, MA 02202

SUBJECT: Runway 14/32 Environmental Impact - **PLEASE STOP THE RUNWAY**

Dear Mr. Pugsley:

I am a long time resident of the South End in Boston. This letter is my request that you seriously consider the unacceptable negative environmental impact that the proposed new runway at Logan Airport will have on me and all residents of Boston.

Even without a new runway the current situation has been virtually intolerable since MASSPORT changed flight patterns last September. What used to be quiet neighborhood with only an occasional police siren is now a nonstop parade of airplanes directly over the South End. The planes start at 6:00 am in the morning and go every 4-5 minutes during peak hours. It's bad enough inside the house when you cannot hear your TV or your telephone. Outside of the house you must stop your conversation on the street while the planes pass overhead and hope you can finish before the next one comes along. I dread the thought of what it will be like on my roofdeck this summer !!! What used to be pleasant experience has turned into a nerve wracking NOISE FEST !!! 186.1

Please consider the unacceptable negative environmental impact the additional NOISE from another runway at Logan Airport will have on the residents of Boston. Our quality of life has been compromised enough for the sake of MASSPORT. Who will want to live here if airplane noise levels triple as a result of a new runway ?? Please save our environment.

PLEASE STOP THE RUNWAY !

Thank You,

Marine Cotton

cc:Byron Rushing, Thomas Menino, Michael Capuaono

Letter 186
Marine Cotton, John P. Kilroy Jr., John O'Connor, and Melissa Sciter
Private Citizens: Boston (South End)

Code	Topic 1	Topic 2	Comment	Response
186.1	Noise	Impacts	[The proposed project will have adverse noise impacts on the residents of the South End neighborhood of Boston.]	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR. The Day-Night Sound Level (DNL) data from Noise Monitor No. 1 at Andrews Street in the South End show levels of 56, 55.2,and 56.9 dB for the 29M Low, 37.5M Low and 37.5M High Fleet scenarios with the Preferred Alternative. These levels are less than the1993 value of 57.9 dB and are well below the standard DNL criteria of 65 dB. 1993 is representative of historic high fleet operating conditions at Logan Airport.

Cc:
Bcc: Arthur Pugsley@MEPA@EOEA
From: "M. B. T." <thaler@webtv.net>
Subject: Comments on DEIS for runway 14/32 expansion proposal
Date: Friday, April 23, 1999 17:52:09 EDT
ttach:
ertify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

LETTER 187

Sir:

I am opposed to the plans to build a new runway at Logan Int'l Airport, Boston, MA. I was a member of the successful class action suit that caused Massport and the FAA to do an EIS fo ther Runway 27 departure flight path that was illegally changed without benefit of one.

Once again, Massport is trying to slip something over on the communtites by trying to get capacity and expansion of the airport accomplished using half truths, faulty data, and political manipulation.

187.1

The "delay issue" is an obviously false one which many others have spoken to being based on faulty data and not solving any problem for more that a year or so, if that. It never takes nto consideration the actual "on time" records of the various airlines that use Logan. The recent report that rated and ranked airlines for just that shows that ertain airlines are more delayed because of internal practices (such as ggage handling etc). Many of these airlines heavy users of Logan. How as this factored in? It wasn't.

187.2

The environmental justice issue must be taken seriously, not just on the basis of per capita income but on what the impact of a new runway would have on people no matter what their income. It took those of us who lived under the flight path of Runway 27 years to get a fair resolution This new runway would increase Runway 27's use by 300% according to Massport's own figures. Is this justice?

Peter Blute and his staff have not been fairhanded with those of us who were willing to work on this issue. Delays were manufactured until the current Governor's inauguration at which time a full press for a PR campaign began. It promoted the new runway to the business community and tried to pit separate communities against each other . Phone calls for information went unanswered and meetings were discontinued.

Mr Blute was reluctant to give us additional time for comments because he and his staff wanted this slipped through as fast as possible. They adhered to a mere shadow of the letter of the law.

Statistics were manipulated. delays were based on the best model for Massport and used the worst yeat, ignoring later improvements, environmental issues were ignored, citizens were denied information and access to timely meetings, opposing stories were told to different munities for the best "spin" for Massport.In short. this EIS process a sham.

I have been involved with Massport for many years. My daughter was in kindergaten when the first planes illegally boomed over my newly purchased home. That was 22 years ago! Yet, I can say that all other Massport management personnel have been respectful of citizens and fair. The current Massport is fascistic at best and I sincerely hope that no hanges tothe airport take place under its reign.

Solutions to the desire to increase capacity at Logan have been well addressed by others but boil down to the fact that Logan and the infrastructure surronding it are simply out of space. We must look elsewhere. Politics and community income level should not be the straw that breaks the Massachusetts camel's back! Outlying communities must be asked to do what those of us closer in have been asked...to share the burden.

Please deny this project.
Thank you.

Mona Thaler
22 Cushing Rd.
Brookline, MA 02445

Letter 187
Mona Thaler
Private Citizens: Brookline

Code	Topic 1	Topic 2	Comment	Response
187.1	Delay	Model	The "delay issue" is an obviously false one which many others have spoken to being based on faulty data and not solving any problem for more that a year or so, if that.	The FAA consistently rates Logan Airport as one of the most delay-prone airports in the United States. Logan Airport's estimated annual delay hours are over five times the FAA's threshold of 20,000 hours for a severely delayed airport. The FAA Technical Center simulated Logan Airport operations in 1992 and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Supplemental DEIS/FEIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29 M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates with those of the Airside Project modeling. The FAA has concluded that the Airside Project delays represent "a plausible and conservative estimate". Delays occur when wind or weather conditions require the use of configurations with fewer than three active runways, when poor weather requires increased separation distances between aircraft, or when airlines schedule more flights than Logan Airport can handle. The Airside Project is designed to reduce delays at Logan Airport from adverse winds and taxiway congestion. The Airside Project addresses delays from constraints at Logan Airport. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a detailed discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport delays within the context of delays at other United States airports.. Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.
187.2	Environmental Justice	Impacts	The environmental justice issue must be taken seriously, not just on the basis of per capita income but on what the impact of a new runway would have on people no matter what their income.	The environmental justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. Refer to Section 6.2 and Section 6.8 of the Supplemental DEIS/FEIR, respectively, for additional information on noise impacts and environmental justice.

Bcc: Arthur Pugsley@MEPA@EOEA
om: "Rob Everts & Deb Biba" <evertsbiba@igc.org>
ject: Airplane noise/Runway 14/32
e: Wednesday, April 21, 1999 11:16:42 EDT
tach:
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

LETTER 188

Dear Mr. Pugsley,
We are writing as residents of Cambridge, MA (near the Somerville border) in opposition to the construction of an additional runway at Logan Airport. The noise levels of flights currently flying directly over and near our home has increased significantly, in spite of the claims of Massport that flights have not increased. Even with the windows closed and storm windows in place, we are awakened from sleep in the early morning (before 6 AM) and well after 11:00 PM. We have begun to use a "white noise" sleep aid but have have found that the sound of the airplanes still cannot be drown out. At certain times of the day or evening, the flights seem constant - spoiling the ambiance of a quiet conversation or the pleasure of listening o the radio or television or reading a book.

We do not live anywhere near Logan Airport yet the quality of our lives is nificantly negatively impacted by the noise caused by the current level lights tracking over/near our home. It is has increased so much that have talked about moving in order to get a decent night of sleep and in order to relax when we are home. We are angry that we would have to even consider that option! We cannot even imagine the nightmare of noise pollution over our home and all over this city if the additional runway is llowed to be built. 188.1

The noise pollution burden on the communities (both next to the airport and in its flight paths) is enormous already. Although we are not sure what measures you utilize to determine "environmental impact," we hope that you will seriously consider the negative impact on the psyche of the citizens ffected by the constant drone of airplanes overhead. If anyone at MEPA as any questions about whether we exaggerate, we invite them to spend a weekend with us. Please stop the airport expansion.

hank you for your attention to this important matter.

incerely,

ebra Biba and Rob Everts
0 Newell Street
ambridge, MA 02140

Letter 188
Debra Biba and Rob Everts
Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
188.1	Noise	Impacts	...the quality of our lives is significantly negatively impacted by the noise caused by the current level of... flights tracking over/near our home.... We cannot even imagine the nightmare of noise pollution over our home and all over this city if the additional runway is allowed to be built.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-12 of the Supplemental DEIS/FEIR.

LETTER 189

cc: Arthur Pugsley@MEPA@EOEA
om: "Brian Culver" <brian_culver@harvard.edu>
bject: 14/32 Public Comments
ce: Thursday, April 22, 1999 16:26:40 EDT
Attach:
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

Massport Runway 14/32 Proposal

Dear Mr. Pugsley
I am a pilot, I am an air passenger and I am a resident living beneath the Logan airspace.

Logan is a poorly placed facility. It suffers the same problems as National Airport, serving Washington DC, Love Field in Dallas or Meigs Field in downtown Chicago. These outmoded airports have survived because of their proximity advantage to the city centers.

But none of them have a bright future. National's operations have been reduced by 15% from what they were 20 years ago. Love Field has been converted into a corporate jet park, with limited commercial traffic and gs Field is expected to be closed in three years for a Park project. of these airports have been able to change because other alternatives have been developed for these other metropolitan areas.

What has changed in all of these cases is people have come to realize that airport operations and urban land use criteria are in direct conflict. Building and/or restoring sustainable cities cannot occur with the land use demands commensurate with large commercial jet operations. Enjoyment of our parks, waterfront, historic sites and other outdoor resources are clearly degraded by aircraft noise.

A "fragile peace" exists between the needs of urban living and airport operations. The people within the airspace have, in general, accepted the present level of air traffic, as limited by the current runway configuration. The residents have chosen their communities and have made billions of dollars worth of real estate investment based on the present set of urban criteria; which have included the present level of air traffic and noise, as limited by Logan's present runway configuration.

The public has accepted the peace. So should Massport. The status quo should be sustained until such time as we have advanced our region's transportation vision for the future. We are moving towards an end to our dependence on air travel. 189.1

Nothing in the Massport proposal is innovative. I believe that the 320 degree approach/ 140 degree departure scheme is unworkable. Try to imagine roach instructions to aircraft to report position downwind of the runway en downwind is in the opposite direction? Try to imagine instructing planes to land or takeoff with a forty knot tailwind. And worst of all; try to imagine giving planes "clearance" to take off directly into the path 189.2

of approaching aircraft.

189. (cont

When planes all approach and depart in the same direction all aircraft in flight are in separation envelopes that change slowly. When planes are erating in opposite directions their separations change at two times the locity of each craft. Human nature being what it is suggests that this de of operation would not stand long before it is modified to allow full approach and departure operations to the northwest of the field.

Opening a new runway will delay our focus on other transportation opportunities. Once we put the idea of airport growth behind us, our public policies can be directed, with full attention toward the new transportation technologies. Even Massport will be turned around. In the end, I believe they will become a strong ally in building a truly modern and innovative transportation system for New England.

Respectfully Submitted,

Brian Culver
385 Concord Avenue
Cambridge, MA 02138

Letter 189
Brian Culver
Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
189.1	Regional Transportation	Regional Airports	The status quo should be sustained until such time as we have advanced our region's transportation vision for the future.	The Airside Project analysis is based on alternative 20-year forecasts of operations by aircraft type. Only larger aircraft compatible with the existing facilities at Logan Airport are included in the future forecasts for Logan Airport fleets on which the delay and environmental analyses are based.
189.2	Alternatives	Runway 14/32	I believe that the 320 degree approach/140 degree departure scheme is unworkable...Human nature being what it is suggests that this mode of operation would not stand long before it is modified to allow full approach and departure operations to the northwest of the field.	Comment noted.

LETTER 190

April 18, 1999

Mr. Arthur Pugsley,
MEPA Unit
Executive Office of EA
100 Cambridge Street
Boston, MA 02202

Dear Mr. Pugsley,

I am strongly opposed to the construction of the proposed runway 14/32 at Logan Airport.

My house is on Lakeview Avenue in Cambridge. When air traffic passes over this neighborhood (the Fresh Pond end of Lakeview) the plane noise is loud enough to awaken me from sleep and, when I'm outside, conversation cannot happen when a plane goes over. To be expected by Massport to tolerate even more noise is unacceptable. 190.1

Please put me on record as strongly opposed to any runway construction, now, or in the future, that would increase air traffic over Cambridge.

Yours truly,
John G. McKernan

Letter 190
John G. McKernan
Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
190.1	General Opposition		Please put me on record as strongly opposed to any runway construction, now, or in the future, that would increase air traffic over Cambridge.	Comment noted.

LETTER 191

5/11/99

Mr. John Silva
Manager Environmental Program,
Airports Division ANE-600
FAA - New England Region
12 New England Executive Park.
Burlington, MA 01803.

Dear Mr. Silva,

I am opposed to the Airport expansion as described in the Environmental Impact statement. The draft has not examined a regional transportation lan. It has not covered the concern of future growth and noise.

191.1 Logan Airport does not conform to it's agreements today, - how will this change in the future?

191.2 Noise is my main concern, and I have noticed the problem getting worse.

191.3 Please have MASSPORT/LOGAN Airport take a Regional look at transportation and insist on them following the limits on noise.

Sincerely,

Ann Rodney
4 Newport Rd #5
Cambridge, MA 02140.

Letter 191
Ann Rodney
Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
191.1	Mitigation	Initiatives	Logan Airport does not conform to its agreements today. How will this change in the future?	Massport's mitigation measures are reinforced through compliance with M.G.L. Chapter 30A, Section 61 and through specific state and federal certificates approving projects that have mitigation. The status of the Section 61 Finding commitments are tracked and reported in the Logan Airport *1999 ESPR* (previously GEIR).
191.2	Noise	Impacts	Noise is my main concern, and I have noticed the problem getting worse.	The Airside Project Draft EIS/EIR shows that the total noise impacts around Logan Airport will improve in the first decade of the 21st century, primarily from the elimination of the noisier Stage 2 aircraft, and by the gradual elimination of the hushkitted Stage 3 aircraft as they are retired.
191.3	Regional Transportation	Regional Airports/ Passenger Rail	Please have Massport/Logan Airport take a regional look at transportation ...	Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.

LETTER 192

FAX

Thursday, April 22, 1999

TO:

(1) Mr. John Silva
Federal Aviation Administration
FAX: 781-238-7608

(2) Mr. Robert Durand
Executive Office of Environmental Affairs
FAX: 617-727-1598

FROM:

Fred Salvucci
MIT Room 1-240
Department of Civil & Environmental Engineering
Cambridge, MA 02139-4307
USA

Fax: 617-258-8073 Tel: 617-258-8131

April 22, 1999

Mr. John Silva
Manager, Environmental Programs
New England Region
Federal Aviation Administration
12 New England Executive Park
Burlington, MA 01803
FAX 781 238 7608

Robert Durand
Executive Office Of Environmental Affairs
100 Cambridge St.
Boston, MA 02202
Attention: MEPA Office/ Arthur Pugsley
FAX 617 727 1598

Re: Logan Airside Project, Boston MA.
EOEA # 10458

Dear Sirs,

I am writing to give my comments on Massport's proposed Logan Airside Expansion DEIS/R. I urge that you reject the DEIS/R as inadequate, and require a resubmittal of a DEIS/R. based on a revised and updated scope to reflect current information, in order to provide the public a reasonable basis for comment. The DEIS/R overstated the number of passengers who will use (or will be able to access) Logan's airfield by the year 2010, and therefore exaggerates the problem of airfield related delay; does not analyze and therefore ignores the problems of terminal related and ground access related delay; underestimates the potential benefits of peak pricing in reducing airfield delay; ignores other means of reducing excessive use of the airfield by regional non-jets; substantially underestimates the adverse noise impacts that would result if runway 14-32 were built; shows that the delay reduction benefits of runway 14-32 are likely to be eliminated by growth in utilization slightly over 5 years, but fails to analyze the danger that the problem of airfield related delay; does not analyze and therefore ignores the problems of terminal related and ground access related delay; underestimates the potential benefits of peak pricing in reducing airfield delay; ignores other means of reducing excessive use of the airfield by regional non- jets; substantially underestimates the adverse noise impacts that would result if runway 14-32 were built; shows that the delay reduction benefits of runway 14-32 are likely to be eliminated by growth in utilization slightly over 5 years, but fails to analyze the danger that the provision of F 14-32 might actually worsen delay by locking in the inefficient non- jet regional aircraft structure that utilizes 40% of the airfield capacity for 10% of the passengers. It fails to properly carry out the environmental justice process or the section 4(f) analysis; misinforms the legal status of decision heights or runway analysis; fails to analyze alternatives to the proposed taxiway; and generally seems designed to "sell" one outcome rather than present balanced information for public comment. The cumulative impact of these distortions are such that the most reasonable conclusion, which I believe is to drop runway 14-32 and the taxiway and focus instead on terminals, transit ground access, incentives to consolidate regional non-jet operations, and renewed commitment to noise abatement is obfuscated.

The draft EIS is so defective in presenting information for intelligent reaction and comment, and the outreach to affected communities has been so defective that it does not meet reasonable standards to be considered as acceptable draft, and therefore deprives the community of a reasonable opportunity to affect the decision.

The primary deficiencies are:

1. The Massport proposal claims it is necessary to add airfield changes, including new runway 14-32 in order to avoid dramatic growth in delay that will otherwise occur when Logan passengers rise from the current 28 million figure per year to 37 million to 45 million by 2010. But,
    - Not withstanding the analysis in the DEIS/R of regional airport, high speed rail, and telecommunications improvements that can account for diversion of up to 7.3 million passengers per year, the DEIS does not adjust the "37 million passenger to 45 million passenger by 2010" estimate to reflect any adjustment to recognize the effect of the regional airport and high speed rail initiative underway. In addition, assuming that the recently announced Massport adoption of Worcester Airport is effective and achieves the 50% capture rate assumed for Manchester, an additional 1 million 2010 passengers will be diverted away from Logan, and the introduction of Rail Service to Green should be expected to shift the service area boundary between Logan and Green, diverting at least an additional 1 million 2010 passengers from Logan. Factoring in just the committed regional aviation and high speed rail improvements, and discounting the more conjectural 192.1

teleconferencing projections, the 2010 passenger predictions should be adjusted to 29 million to 37 million, that is, passenger growth of 0 to 8 million at Logan between today and 2010. This dramatically affects the projection of increasing delays at Logan, in particular over the next 5 years when the "hassle factor" of contending with "big dig" and Logan construction will coincide with improving service at Manchester, Green, Worcester, and high speed rail service to New York. The entire bases of the DEIS/R is flawed by this failure to include any adjustment in passenger demand projection at Logan for 2010 to reflect the regional airport and regional rail programmed improvements, and a new DEIS must be prepared to provide a meaningful set of projection to consider. 192.1 (cont.)

- The Massport report contains no analysis of how 35-50% more passengers can get to Logan or through the terminals, when the parking spaces are limited by the Clean Air Act "parking freeze", and transit improvements that were proposed at the airport Blue Line Station and a high-capacity people mover have been abandoned by the state and Massport and the terminal A rebuilding plan has been stuck for years and will have lower capacity during reconstruction. Regional EPA proposed in 1995 that airfield studies should be included in a comprehensive analysis of access to Logan and the capacity through the terminals. Recent events since the "scope" of the study was set in 1995 have proven that the EPA was right. It is not at all clear that many more passengers can get to Logan or through the terminals. In any case, it is absolutely essential that a new draft EIS be prepared that includes a comprehensive analysis of access to Logan, as well as terminals, to evaluate the airfield proposals intelligently. 192.2

- The Massport document shows in figure 1.5-8 that overscheduling of flights at Logan decreased from 1993 to 1998, presumably resulting in reduced delay, but there is no information about actual delay at Logan during this period; only computer predictions about increased delay in the future. But if airline consolidation within the regional carriers has produced a modest reduction in overscheduling, as suggested in the Massport DEIS/R, how has this affected delay and could further consolidation of regional flights produce further reduction in delay? 192.3

- The consultants to the Community Advisory Committee to Massport(CAC) believe that delay has decreased substantially and cite FAA-produced data as evidence. If Massport had continued to dialogue with the CAC, instead of cutting off communications and shifting to a media strategy, there might be credible information on the table. At this point, for a proposal with major adverse impact because of increased overflight in our communities (at least triple), there is precious little real data about actual delay as defined by FAA. There is not adequate information about delay to allow us to comment intelligently. 192.4

2. The noise information presented is so questionable that it needs to be revised into a new draft, to provide a reasonable basis for public involvement.

- The DEIS/R uses computer projections of noise, but the computer projections consistently understate actual noise as measured by Massport over field microphones. 192.5

This problem has been called to the attention of Massport for at least 3 years, but the DEIS/R is based on the inaccurate computer projections and needs to be redone.

- The tripling of overflights predicted actually understates the shift in operations that will occur given the long experience with FAA control tower ignoring the PRAS whenever delay exists. Given Massport's projections of increased delay within 5 years, the utilization of runways 15/33 and 9/27 is likely to more than triple. The lack of analysis of this actual increase in overflight likely makes the noise predictions further understated. 192.6
- Land Use and Coastal Zone Impacts and Smart Growth are ignored- the DEIS ignores the impact of increased overflight, (by a factor of at least 3!) on currently underutilized land in the Seaport district of Boston, and in Chelsea, Everett and Somerville. Because of enormous public investment in the Boston Harbor Clean Up, the Big Dig, and the Urban Ring Transit Project under planning, these formerly underutilized areas are poised to play major roles as centers of "Smart Growth", and benign and compatible uses of the coastal zone, but the Massport DEIS/R ignores this issue. 192.7
- The entire analysis assumes that Runway 14/32 will be used only in overwater approaches and departures, but Appendix I indicates that US statute makes that decision solely the province of the FAA. Such decision must comply with N.E.P.A. But there is no guarantee that even a full EIS would be required to use the runway in both directions. Any interference with the two-way operations of Runway 14/32 posed by the Hyatt Hotel could be removed with the collaboration of Massport. Given recent decisions by Mass Highway and FHWA to reverse commitments made in the 1991 ?SFEIS? for the Central artery/Tunnel project, eliminating commitments to improve transit and substituting 36' high and 53' high highway ramps for highways that were promised to be at or below 192.8

grade, there is no basis for confidence that the runway will be unidirectional. The
DEIS/R contains no analysis of the noise and safety impacts on Jeffries Point, East 192.8
Boston, Charlestown and Beacon Hill that would be caused by two-way operation of (cont.)
Runway 14/32. Failure to disclose the potential impact, and the lack of any disclosure of
credible guarantees on this matter is a substantial flaw that requires that the draft EIS/R
be rejected as inadequate.

- The DEIS/R uses 1999 simulated information as the basis of comparison for predicted
  year 2010 impacts in a variety of scenarios. But the choice of 1999 makes comparisons
  confusing. The primary Massport strategy to reduce overall noise impact over the past
  decade has been to require the airlines to use higher proportions of Stage III, less noisy,
  jets. The federal law requires the phaseout of all non-State III Aircraft by the year 2000,
  so certainly Logan, with its stricter noise rule should be all Stage III Aircraft by the year
  2000. This noise abatement program was committed in the 1980s, as mitigation for the
  increased frequency of overflight that would occur as flights more than double in
  frequency(if accurate measurement of noise contours actually experienced in the
  community had been in practice, Massport might actually have achieved this level in
  advance of the year 2000.) The benefits of all Stage III aircraft is a long-awaited
  mitigation of increased frequency that Logan's neighbors are entitled to. For this reason,
  the 1999 simulation should be run with an all stage III fleet, in order to understand the 192.9
  true impact of the various alternatives, and should be used in particular to identify section
  4(f) impacts, for all park and historical resources currently affected by Logan or
  potentially affected. Because of the failure to identify the 1999 all Stage III exposure, the

basic analysis of Section 4(f) impacts and noise comparison among alternatives is seriously in error, and the draft EIS/R substantially flawed, and should be withdrawn.

3. The DEIS does not explore a reasonable range of alternatives.

- Massport owns Hanscom Field, an existing airport adjacent to Rte. 128, but no analysis is done of the potential share of commercial activity that Hanscom might absorb, and the net environmental impact on the Hanscom environment if military and General Aviation Activity were displaced. The potential sitare of traffic is likely to be substantial, since Hanscom is better situated for much of the suburban and Rte. 128 market than either Manchester or Green, so a substantial share of the market now using Logan would seem to be potential. With no analysis of this alternative, the draft EIS/RIR is substantially flawed and should be viewed as an inadequate basis for comment. 192.10

- The overutilization of Logan airspace by regional carriers who use 40% of the airspace to accommodate 10% of the passengers is the central problem driving delay at Logan, but the only option explored to deal with this is a very weak form of peak pricing, with a very high "trigger" of 110 movements per hour. No sensitivity analysis is presented, to explore the impact of different "triggers" set at 105,100 or 95 movements per hour. Also, the analysis methodology assumes that flights may move out of the peak, or be eliminated, but does not explore the possibility the flights will be consolidated into a smaller number of larger aircraft. For this reason the analysis both understates the delay reduction potential of this method and overstates its economic impact. No analysis of 192.11

"grandfathering" or "exemptions" for special circumstances is presented, resulting in an exaggerated prediction of economic impact, and a very distorted analysis. The likelihood that even a weak form of Peak Pricing would tend to preclude the high delay "high" scenario is not even mentioned, even though the delay avoidance benefits of the Low vs. High scenario are greater than the differences among the alternatives considered. Since Peak Pricing will tend to inhibit the profitability of redundant regional services, it seems likely that the Peak Pricing would preclude the High Scenario from occurring, and that it should be tried before any of the construction scenarios. The availability of "baby" 15-L-33R and 4L-22R for modest numbers of small aircraft movements to accommodate "exceptions" and "grandfathering" would seem to make such a scenario quite attractive, but the basic analysis is not presented in this draft to evaluate this, so once again the draft EIS is fundamentally inadequate and should be withdrawn. 192.12

- Other alternatives to control overscheduling such as "slotting" Logan at a reasonable number of movements per hour, using market measures to distribute the "slots" are not evaluated whatsoever. 192.13
- Use of limited priority based on size of aircraft to reduce the impact of airfield delay is not considered. Limited prioritization of takeoffs based on size would seem to be a very straightforward way to minimize the impact of delay on passengers and equipment utilization, and sensitive connecting flights. Already existing "Gate-hold" Procedures could be modified to incorporate the same principle for landings, but this possibility is not explored. 192.14
- Simple "jawboning" of regional air carriers is a technique that might have substantial benefit, especially if accompanied by phase-in of Peak Pricing or lease restrictions to 192.15

encourage movements toward an all-jet Logan. This possibiolity is not evaluated at all. 192.16
The effectiveness of the P.A.C.E. program in 1988 is not described or evaluated.

- There are no alternatives considered to the centerfield taxiway proposal. It would appear that the threshold of runway 4L-22R could be displaced substantially to the south, in 192.17 order to increase the height of aircraft landing over the Bayeswater St. neighborhood, reducing noise and increasing safety margin. Since over???to ??? from the north are ??? to small aircraft on runway 4L-22R, it should be possible to displace the threshold substantially to the south, and allow aircraft landing on 4R to "turn early" across the inactive northerly remnant of 4L-22R. This displaced threshold should permit consideration of higher blast fence to protect the Bayeswater neighborhood, and the Constitution Beach. It should be possible to consider replacing taxiways November with 192.18 a buffer ?? to protect the beach. Since the entire premise of the Massport airfield proposal is that the 4-22 runways will be utitlized less, it is not clear why the centerfield taxiway is needed at all, or alternatively why a sanitized northerly ENV of runway 4L-22R cannot serve as the taxiway for the northerly portion in lieu of the "November" taxiway which adversely affects Constitution beach. This could avoid the adverse noise and habitat destructions associated with the northerly part of the Proposed taxiway and "November."

4. The draft EIS/EIR does not respect the Environmental Justice Executive Order.

- The core of the Executive Order, and the DOT implementing order of April 1997, is 192.19 identification of affected populations, with particular identification of minority populations and low-income population, and establishment of communication and interaction, identification of disproportionate impacts or benefits and of alternatives to avoid or mitigate disproportionate impact. This process was not followed.

- The draft EIS includes 7 pages of discussion which basically asserts that no disproportionate
  impact exists by identifying the proportion of low-income and minority people affected, after
  assuming mitigation. The basis of the numbers is not clear(1990 census? 1995 update?) The
  interpretation that soundproofing can mitigate, so that the impact can be denied is 192.20
  inappropriate. The Executive Order requires a process that identifies impact and
  communicates with affected people to consider alternatives. Mitigation such as
  soundproofing is appropriate to ameliorate unavoidable impact, it is certainly never
  complete, and should not be used to deny the impact in the first instance. Also, there is no
  disclosure in the draft EIS of how soundproofing can be achieved in low-income housing 192.21
  units where the structure may have other building code problems, and owners may lack
  access to financing and rent levels, and therefor financial resources, are constrained by low-
  income. It took a decade to get the Logan soundproofing program working reasonably for 192.22
  middle class homeowners. There is no discussion of the kind of program that would be
  required to make it work for non-owner occupied low income housing.
- There is more discussion of the economic impact of Peak Pricing on Cape Air, and prediction 192.23
  of difficulty of access to Nantucket, Provincetown and Martha's Vineyard than there is in the
  entire Environmental Justice section!!

- The analysis of differential impact should be *comparative.* Alternatives such as Hanscom
  Field or Peak Pricing are likely to have NO adverse impact on low-income or minority 192.24
  populations. Moreover, low income people, who are less likely to fly, are less likely to

benefit from any reduction in delay. But there is no comparison of alternatives based on environmental justice concerns.

- Whatever an appropriate decision might be *after* Environmental Justice consideration(it is possible that the FAA and Massport might choose alternatives with high Environmental Justice impacts after full consideration). The Executive Order and DOT implementation order are clear that Environmental Justice principles are to be considered at the earliest possible point in the process and occur before decisions are made. That has clearly not occurred in this draft EIS and on that basis alone the DEIS/R is inadequate and should be withdrawn. 192.25

5. The television and radio(and newspaper) advertising program by Massport constitutes a major flaw in the environmental process and a violation of environmental justice and in and of itself requires a withdrawal of the draft EIS/R. 192.26

- The topic of airfield delay and alternatives to deal with it is a very complex subject. The television and radio advertisements oversimplify and distort this complex issue. Television and radio are difficult means to communicate complex public policy issues in any event, but the Massport advertising initiative makes no attempt at a balanced presentation. There is no disclosure that the Runway 14/32 will cause substantial increase in overflight of some communities, there is no identification of alternatives. The entire communication of the draft EIS is imbalanced, leaving out important information and analysis. But the radio and TV advertisements, which are heard by many more people than read the Draft EIS is a totally biased "sales pitch" which makes no pretense at balance. Quite apart from the appropriateness of a public agency engaging in paid media communication, in coordination with private interested parties, the biased and unbalanced nature of the communication further flaws an already inadequate and imbalanced draft EIS. It must be emphasized that the expense of such communication is totally beyond the financial capacity of the low and moderate income communities adversely affected by the runway proposal and constitutes another violation of Environmental Justice principles. The advertisements also appear to be available only in the English language despite a significant Latino population in the impacted area.

Comments on the Logan Airside DEIS/R SCOPE

The DEIS/R is so deficient and misleading that it should be rejected and "rescoped" in order to provide a document adequate for public comment and interaction to serve as a draft. The most serious scope deficiencies are: 192.27

(1) The scope of the document was established in 1995, over 3 years ago.

(2) The DOT Implementing Order for the Executive Order on Environmental Justice was issued April 15, 1997, and requires identification of low-income populations and minority populations; consideration of disproportionate impact, consideration of alternatives and mitigation and adoption of practicable alternatives to mitigate. Environmental Justice principles are to be applied at the earliest possible time. These procedures were not followed (even though the Executive Order itself dates from 1994, and the DOT order has been available since April 1997). The only way to remedy the substantial flaw in process is to begin again. 192.28

(3) The scope of the study is much too narrow.

a) It focuses on airfield delay caused by northwest wind. Since by Massport information the northwest wind problem causes approximately 20% of airfield delay, and the remainder of airfield delay will grow to exceed current airfield delay within 5 years, this is much too narrow a problem definition to be serious, and appears to have been selected to predetermine a conclusion to build Runway 14-32. 192.29

b) Even all airfield delay is too narrow a problem definition, as it concentrates excessively on the airfield, to the exclusion of delays caused by deficiencies in the terminal 192.30

configuration. There is no information in the DEIS/R on the question of all delay caused to landing aircraft waiting for a gate, but this appears to be a growing source of delay.

192.31 c) The definition of airfield delay does not include analysis of delays caused by small aircraft in the fleet mix. The FAA safety procedures require increased separation when significantly different aircraft follow each other, affecting capacity and causing delay. There is no consideration of this issue, nor is any time dimension placed on the differential time required in transit by the current practice of using non-jets in regional markets. This industry practice appears to be changing in response to customer preference, and analysis of the comparative time in transit could provide insight into the likelihood of major changes in the regional fleet, which now utilizes 45% of the airfield capacity to accommodate 10% of the passengers, according to the information in the DEIS/R. The DEIS/R does not include analysis of the constraint imposed by differential size.

192.32 d) There is no analysis of the potential restructuring of regional air travel, as small jet services make direct flights from Green, Manchester, Portland and other regional airports more attractive than the indirect service of regional carriers to Logan to transfer to other flights. Understanding the potential substitutability of these more direct flights could provide more insight into aircraft movements required to accommodate regional demand, over the next 10 to 15 years.

192.33 e) Even all aircraft delay is too narrow a scope, focusing excessively on the interest of efficient utilization of aircraft. Passenger delay includes delay in processing ticketing and baggage for both emplaning and deplaning passengers. These delays are caused by terminal design constraints and personnel schedules, and increase with congestion in utilization of a given terminal configuration. If the typical passenger follows information to arrive 2 hours in advance, these delays clearly involve more passenger hours than the airfield-related weather delays, but they are borne by the passengers, not the airlines, and are not analyzed in this DEIS/R.

f) There is no analysis of passenger delay in accessing Logan on the metropolitan area road and transit system. This system is congested, parking at Logan is limited by the Clean Air Act parking "freeze", and improvements in public transport access are lagging. This factor affects passenger and cargo delay and reliability, and appears to be affecting consumer choices to use Manchester or Green instead of Logan. Since over 50% of Logan passengers originate outside of Route 128, understanding this market is essential to understanding Logan's future. 192.34

g) Regional EPA proposed in its scoping comments of 1995 that a comprehensive analysis of the airport, including the (metropolitan) ground access and terminal capacity and its interrelationship with any airside proposals should be included. Unfortunately, the DEIS/R ignores the need for a comprehensive approach, and refers the reader to the Generic EIR, a state document which, among other problems, deprives citizens of protection of federal laws such as the NEPA requirement to analyze socioeconomic as well as environmental concerns, Title VI (Civil Rights), Section 4(f), and the Executive Order on Environmental Justice. 192.35

h) At the time the scope of the DEIS/R was developed, Massport was proposing a "People Mover" to substantially improve transit access to the Blue Line, and the CA/T project was committed to a major upgrade in the Blue Line Airport Station, including cross-platform transfers in both directions. Now Massport and Mass Highway have withdrawn these commitments, giving rise to the question, "How on earth can Logan handle 50% to 100% growth in passengers with a parking freeze and no significant transit improvement in sight?" This is a fundamental change since 1995. 192.36

i) In 1995, the Port Authority was talking about redeveloping Terminal A through a "privatization" mechanism. Today they have apparently concluded that will not succeed, but there is no clear timetable for the redevelopment of Terminal A, the most prominent terminal at Logan, and the most problematic. While that terminal is being redeveloped, the capacity to handle passengers will go *down* unless a successful mitigation strategy can be developed. Terminal A was to have been redeveloped with a shape designed to buffer noise impacts on the nearby Jeffreys Point neighborhood. In addition, and with no increase in number of gates, rumors indicate that Massport now intends to abandon the noise buffer shape, and add gates. This would constitute "segmentation." A revised scope should include Terminal A redeveloped including any options. 192.37

j) At the time of the scoping (1995), Massport's consultants had developed computer models to predict aircraft movements based on data from 1993, the worst year for delay caused by excessive scheduling of redundant regional commuter services. Most of the projections in the DEIS are based on these projections. The DEIS concedes that airfield delay at Logan actually went down since 1993, but there is no effort to analyze what happened, much less to correct the computer programs to incorporate this in forecasting. This rendered the projection of air movements questionable as well as the resulting predictions of the effectiveness of peak pricing in reducing delay. Realistic air traffic predictions require an open review of the actual data to develop an understanding of what is happening, in order to produce more reliable methods to predict future conditions. 192.38

k) Overflight of parts of East Boston and Chelsea affected by Runway 15-33, and of South Boston, the South End, Jamaica Plain and Roxbury affected by Runway 9-27 is predicted to triple (based on the computer models which include "PRAS" goals if Runway 14-32 " is available. However, experience shows that during delay conditions the FAA controllers ignore PRAS goals and utilize maximum capacity configurations, so the tripling of exposure to overflight predicted with availability of Runway 14-32 actually *understates* the likely reality. More realistic utilization estimates should be prepared, at least to provide a range of estimate. 192.39

l) Noise impact from aircraft is projected in the DEIS by using computer models. but citizens have complained for years that the noise levels measured by Massport microphones monitored in the field show that actual noise consistently exceeds the predicted levels. Since the computer's predictions are used to decide on the need for airlines to improve the fleet (by replacing noisier aircraft with quieter ones under Massport noise rules), and to decide on eligibility for soundproofing, this is a very important fundamental flaw. In addition, these same models are used to predict noise consequences of the airfield proposals, so the predictions in the DEIS/R understate actual impact. The computer models should be adjusted to better simulate actual noise impacts. 192.40

Moreover, MEPA requested the preparation of 60dB contours, as well as 65, 70 and 75, but this information is not included in the tables in the main report. (There is some information in the appendices for those with the patience to find it.) 60dB contours should be prepared (using conrsited models) and used in the analysis. 192.41

m) Credibility of environmental commitments has been undermined by Mass Highway reneging on the Airport Station Blue Line commitments. In addition, the Mass Highway revisions constitute a segmentation flaw in the airfield project. The Mass Highway proposal should be suspended, and it and suitable alternatives incorporated into the revised scope. 192.42

In short, based on these multiple flaws, the DEIS/R scope is so out of date as to be meaningless. It should be withdrawn and a new scope developed, consistent with Environmental Justice principles. 192.43

Additional Observations on the DEIS/R, and Scoping Revisions Required:

1) The central problem with airfield capacity is the fact that it is overutilized, as always occurs at facilities in attractive locations unless they are managed through regulation or pricing. Because of a variety of wind and weather conditions, reliability of Logan is much higher at frequency of less than 100 movements per hour, whereas it becomes very unreliable as utilization approaches the maximum capacity of close to 120 movements per hour. Yet the DEIS/R does not provide basic information to identify the reliability of Logan at 75, 85, 95, 105, 115 movements per hour so that the trade off between frequency and reliability can be understood. The 1993 SAR report by Arthur D. Little rates the practical capacity of Logan at 95 movements per hour, and the FAA rates its practical capacity at 93 movements per hour. 192.44

The further fundamental issue at Logan is the fact that approximately 40 percent of the airside capacity is used to accommodate small regional non-jets which carry 10 percent of the passengers, (and a large proportion of the regional passengers are just passing through to other destinations.) If substantial consolidation of regional flights could be achieved, Logan would operate at or below 100 movements per hour and be highly reliable. 192.45

Recognizing this fundamental problem of misutilization of available runway capacity, and the tradeoff between overscheduling and reliability, it should be possible to accommodate substantial increase in passenger service without any airfield expansion. Over the past 20 to 25 years Logan has grown from 8 million passengers per year to over 26 million, with no airfield modifications of significance, because of improvement in technology and increased jet size. Since adoption of the "no increase in environmental impact" policy agreed to in 1987 in the context of the environmental impact studies on the third harbor tunnel, Logan has stayed within the 1987 noise contour, showing that minor increases in passenger volume can be accommodated on the Logan airfield without increased delay and unreliability *and* without increased noise impact in surrounding communities. In order to encourage the better utilization of Logan runways, six basic strategies are possible:

A) A Clear Policy of No Airfield Action. The overscheduling problem is clearly caused by airline scheduling practice. It also costs the airlines a lot of money, because of inefficient utilization of aircraft, and hurts the image of airlines with customers. The primary cause of current delay is the overutilization of small non-jet aircraft in the regional carrier market, but there is some tendency for more comfortable, faster, and larger "small jets" to be increasingly used in these markets in response to customer preference and changing airline market relationships, so there is some likelihood that a message to the airlines that runway 14-32 is off the table definitively would lead the airlines to resolve the runway overutilization problem on their own without any other action by Massport or FAA. 192.46

B) Option 1 could be supplemented by a "jawboning" approach with the airlines to schedule more realistically.

C) Option 1 could be complemented by reform of landing fee structure to move toward peak pricing, giving some market incentive to encourage rationalization of the regional feeders.

D) Option 1 could be complemented by delay management strategies to prioritize larger aircraft over smaller whenever delay conditions exist, thereby minimizing the impact of delays on the largest number of people and the most expensive aircraft, and also sending a strong signal to the airlines encouraging a shift to jet operations.

E) **Logan could set a goal of becoming an "all jet" airport by a date certain, giving a** period of time for adjustment followed by a policy of priority for jets on takeoff whenever delay exists.

F) Logan could become a "slotted" airport, with schedules constrained to no more than 95 movements per hour, and a periodic auction mechanism to avoid the anticompetitive aspects of "slots" in other cities, and in Europe.

The DEIS explores only peak pricing among these options, and appears to design it in order to fail, with the peak defined at 110 movements per hour for three successive hours, a level of activity so high the effect on the system should not be expected to be significant.

Moreover, the analytical approach to analyzing the peak pricing seems totally flawed. The DEIS/R hypothesizes a high fleet and low fleet scenario, based on a high and low passenger forecast, and then uses a model to predict schedule shifts out of the peak period and in some cases elimination of flights. But it ignores the fact that the existence of even a weak peak pricing system would inhibit the "high fleet" scenario from developing at all, since it would decrease the profitability of redundant regional
services, encourage higher load factors, and, over time, shift to small jets at lower 192.47
frequency. None of these effects are evaluated, but the differences in delay between high fleet and low fleet scenarios are greater than the differences in delay between the "with" and "without" Runway 14-32 within a given scenario. This leads to a conclusion that the introduction of even a weak form of peak pricing should occur immediately as suggested by EPA in 1995, so its effects can be evaluated and fine

tuned. The DEIS fails to report on the performance of the PACE program which was tried with some success in 1988. 192.48

The fact is that the current landing fee system is indefensible, except as a relic. It is unrelated to the opportunity cost of using the runway and subsidizes inefficient aircraft to the detriment of the vast majority of passengers.

2) The noise analysis is inappropriate, systematically understating the likely average noise impacts of the introduction of Runway 14-32. While the DEIS predicts a tripling of overflight in Chelsea and East Boston, Somerville, and South Boston, South End, Roxbury and Jamaica Plain; the model is constrained by PRAS goals. But experience has shown the FAA control tower will ignore PRAS goals whenever there is congestion, so even greater increases are likely. 192.49

In addition, the computer generated noise contours understate noise as measured in the field.

Even ignoring the understatement, the addition of Runway 14-32 clearly increases the noise affected population, and thus violates the 1987 environmental cap, and should be rejected on that basis alone. 192.50

In addition the DEIS attempts to obfuscate the noise impact by focusing on 75 DB contours rather than the 65 used by FAA or the 60 suggested by MEPA. But the households within the 75 DB contour shrink in all scenarios because of fleet improvement, as the category II aircraft are replaced by the less noisy category III aircraft, and all of these affected households have been soundproofed. Based on the Massport theory of mitigation, the already soundproof homes within the 75 DB contour will experience some relief from the fleet improvement. It is the increase in exposure of households in the 60 DB contour who represent the most significant worsening of noise conditions, without soundproofing, but these numbers are not calculated, and the 60 DB contours are hidden in an Appendix. 192.51

The benefit of compliance with the PRAS is exaggerated in the DEIS/R. The PRAS was a negotiated agreement 25 years ago. It is a way to share basically unreasonable amounts of noise. It is not really so significant as reducing noise by improving the fleet mix through retirement of the noisiest aircraft, or minimizing the number of households within the 60 DB contour.

In addition, the selection of 1999 and 2010 distorts the comparisons, since the phasing out of all Stage III aircraft is due in 2000, and make it more difficult to understand the effect of various proposals. Including a 2001 analysis would separate this effect.

In any case, the measurement of noise should be improved in order to enforce the fleet noise rule more aggressively, and in order to more fairly implement the soundproofing and other mitigation strategies, and more realistically estimate impacts. (However, it is clear even from the inadequate analysis of the DEIS/A that the Runway 14-32 would have substantial adverse effect, violates the 1987 no increase in impact policy, and should be rejected.) 192.52

3) Analysis of the Reduction in Landing Minimum s is Misleading and Inadequate

The landing minimums on Runway 15 and 22 were deliberately held high pursuant to agreements with the city of Boston. The community's objective in negotiating these higher than normal decision heights was to discourage use of landing over populated areas during low visibility conditions, and to encourage instead the use of overwater approaches during low visibility conditions, by installing Category III instrument landing systems, with the lowest decision heights on the 4R and 33L overwater approaches. The DEIS does not accurately describe the reasons for the agreements, or even the fact that the city of Boston 192.53

192.5 (cont.

has contractual rights in this matter. Worse yet, Category III ILS has yet to be installed on Runway 33L. The DEIS/R predictions of improvement of reliability during low visibility conditions is not disaggregated to identify the benefits attributable from improved instrumentation on runway approach 33L which the community supports, as distinguished from the decision height reductions on runway approach 15R and 22L, which the community opposes. In addition, the community has always understood that low visibility conditions generally occur under low wind conditions, but the DEIS/R implies that wind direction is a factor in this proposal. No identification of the frequency of high wind/ low visibility conditions, or data, is presented. Finally, the community concern with low visibility landings over populated area is with safety, and the anxiety caused by such operations in the residential population, but the DEIS/R treats it as a simple noise problem.

192.5

4) The analysis of the taxiway proposals is inadequate. Since the primary taxiway proposal is the taxiway proposed between the 4-22 parallel runways, and since the DEIS/R states that the intention of the package is to *reduce* utilization of the 4-22 runways, it is difficult to understand what delays are proposed to be alleviated. Since the taxiways will increase noise exposure in the Bayeswater section of East Boston and Winthrop, this is controversial, and inadequate explanations of its purpose is presented to allow for intelligent comment. Including the alternatives such as sanitizing the Northern End of Runway 4-22R, and using it as a taxiway should be included in a revised scope.

5) There is no analysis of metropolitan ground access capacity or terminal capacity to shed light on the feasibility of the 37 million and 45 million passenger projections. With the current parking freeze and no coherent strategy to improve transit, it is difficult to see how even 37 million passengers can reach Logan. The current terminal capacity does not appear

capable of processing appreciably more than current passenger levels. Whenever Terminal A is redeveloped it will probably *lose* capacity during the construction process, but possibly add capacity once it is complete. But there is no analysis to show what number of passengers will be able and willing to access Logan over the next decade so the air service needs can be verified, and the timing of improved access to Green Providence via rail, and high speed rail to New York can be evaluated in the light of more severe growth and terminal access problems at Logan. The missing information is fundamental to make informed choices at Logan. 192.55

6) The appendices on the history of Logan airport are totally lacking in explaining the history of the residential communities around Logan and their interaction with Logan growth. Some basic facts which are necessary to understand the socioeconomic context of Logan should include:

A) The fact that the residential communities predate the existence of the airfield.

B) The major community disruption caused by construction of the Sumner Tunnel.

C) The community disruption caused by the Blue Line extension.

D) The destruction of Wood Island Park caused by expansion of Runway 15-33.

E) The destruction of the Neptune Rd. neighborhood by the combination of increased noise, instillation of the ILS localizer, and the (positive) relocation of houses to the Horace St. area. 192.56

F) The destruction of Amerena Field to expand the airport cargo area and build the (now vacant) post office area.

G) The crash landing of a small plane on the porch of the home of Senator LoPuesti of Bayeswater Street, and the subsequent limits on the use of Runway 4L-22R.

H) The massive trucking on Maverick St. caused by filling the Bird Island flats, the community reaction to the trucks and the development of the internal airport truck route and gating of Porter St. and Maverick St. to control airport related traffic.

I) The gridlock conditions on the airport exit roadway which led to the variable message egress control system to manage the problem, and the growing Day Square traffic.

J) The development of the 1975 master plan and generic EIR process, and the "parking freeze" at Logan.

K) The installation of improved ILS systems on runway approaches 15R and 4L, and the restrictions on decision height agreed to by FAA and the Mass. Port Authority.

L) The development of Porzio Park and the development of the Bird Island Flats cargo area, with the harborside park.

M) The environmental process for the Ted Williams Tunnel, the commitment to a cap on environmental impacts at or below 1987 limits.

N) The implementation studies to implement the 1987 environmental CAP (improved parking freeze, Logan noise rules, Logic study, LADS study, and LAMP study, P.A.C.E. Program. Establishment of CAC.)

O) The commitment to improve transit interface between the airport bus and Blue Line at Airport Station, with cross platform transfer in the 1991 SFEIS of the Central Artery/ Tunnel Project.

P) The initiation of Logan Express services, water shuttle.

Q) The increased relationship with Chelsea for airport-related activity.

R) The commitment to an airport edge buffer park. (not implemented to date)

S) The 1993 Massport-Air Inc. mitigation contract.

T) The Waterfront Park at Marginal St., Jeffries Point section of East Boston.

V) The lawsuit on non-performance of the 1993 agreement.

W) The 1997 mitigation agreement.

7. Given the reliance on environmental commitments in the proposed Runway 14-32, a list of "broken promises" that undercut the credibility of such assurances is worthwhile.

A) Airport Blue Line station (CA/T Commitment, but Massport did not defend the honoring of the commitments to cross-platform transfers and at- or below- grade highways, when Mass Highway removed the Transit improvements and substituted very high (36' and 53' high) highway ramps.) 192.57

B) Airport buffer edge (not implemented)

C) Free shuttle to South Station, added Logan Express service, PeopleMover to Blue Line to increase capacity by a factor of six (now broken).

D) Flight tracks and PRAS

E) Landing decision heights in bad weather

F) Taxiway use regulation to restrain noise exposure at the northern end of the 4-22 runways.

G) The blast fence at the northern end of the runway 22R, which Massport intermittently proposes to remove.

8) The Section 4(f) presentation is substantially flawed and a revised analysis should be required in a new scope. Specifically all Section 4(f) resources affected by current operations or proposed actions should be identified. Their noise exposure today and in 2001, within all Stage III fleet should be identified, to establish a new "Base Condition" based on existing regulation, and the 192.58

impact of various proposals upon 4(f) resources identified. In addition, analysis to identify “all flexible planning to mitigate adverse impact should be carried out and presented.

9) A revised DEIS/R scope should carry out an analysis of impacts on coastal zone and smart growth land resources in the South Boston Seaport area, Chelsea, Everett and Somerville. 192.59

Letter 192
Fred Salvucci
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Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
192.1	Analysis Assumptions/ Methodologies	Passenger Forecasts	The 2010 passenger predictions should be adjusted to 29 million to 37 million...to reflect the regional airport and regional rail programmed improvements	The Airside Project analysis considered the benefits and impacts of alternatives against a broad range of current and potential future activity levels at Logan Airport. A benefit of this approach is that the findings and selection of the Preferred Alternative (Alternative 1A) were not dependent on a specific future condition, but reflect consideration of different scenarios. The analysis of comparative benefits for the alternative airside projects focussed on activity levels at 29 million and 37.5 million annual air passengers with different possible fleet scenarios. These activity levels reflect probable near- and long-term conditions and include diversion of up to 7.3 million passengers that could be accommodated by regional alternatives. The activity levels and the corresponding benefits and impacts of the proposed improvements were central in the selection of the Preferred Alternative.
192.2	Analysis Assumptions/ Methodologies	Passenger Forecasts	... report contains no analysis of how 35-50% more passengers can get to Logan through the terminals, when the parking spaces are limited by the Clean Air Act "parking freeze," and transit improvements that were proposed at the airport Blue Line Station and a high-capacity people mover have been abandoned by the state and Massport and the Terminal A rebuilding plan has been stuck for years and will have lower capacity during reconstruction. It is not at all clear that many more passengers can get to Logan or through the terminals. ...it is absolutely essential that a new draft EIS be prepared that includes a comprehensive analysis of access to Logan, as well as terminals, to evaluate the airfield proposals intelligently.	In January 2000, the FAA called for a Supplemental Draft EIS and a special panel review process. The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. The impact of the passenger activity levels, analyzed in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR, on ground access patterns was studied and reported in previous GEIRs. The GEIR and its Updates are specifically incorporated by reference in these environmental review documents as background documents. The groundside impacts of the parking freeze, the Blue Line Modernization project, the AITC, which replaces the people-mover project, and the new Terminal A development have been analyzed in the *Logan Airport 1999 ESPR* (ESPR) (previously GEIR). The ESPR was filed on December 15, 2000.The ESPR informs Massport's planning process for all the improvements at Logan Airport, including the improvements under review in the Supplemental DEIS/FEIR. Each ESPR submission is subject to public review and comment. Consistent with past practice, Massport expects that the FAA will take the ESPR analysis into account during its deliberations and decision on the Supplemental DEIS/FEIR.

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192.3	Delay	Model	... flights at Logan decreased from 1993 to 1998, presumably resulting in reduced delay, but there is no information about actual delay at Logan during this period; ... if airline consolidation within the regional carriers has produced a modest reduction in overscheduling, ... how has this affected delay and could further consolidation of regional flights produce further reduction in delay?	The Supplemental DEIS/FEIR presents an expanded analysis and discussion of current and historical FAA delay measures, and additionally quantifies modeled delays at Logan Airport during 1998. Refer to Sections 1.6 and 1.8 of the Supplemental DEIS/FEIR. The delay measures and Massport's modeling both show that Logan Airport continues to suffer from serious airside delays despite the regional carrier consolidation and the decline in regional carrier operations. Regional carrier consolidation did not substantially reduce delays at Logan Airport because airline overscheduling is not a significant cause of delays at Logan Airport. As the Airside Project analysis shows, the lack of a three-runway configuration to handle arriving flights during periods of northwest winds is a major source of Logan Airport delays. Furthermore, the impact of regional carrier consolidation on future delay levels was explicitly examined through the analysis of several future "Low" fleet scenarios, which assume that commuter aircraft comprise a smaller share of Logan Airport's fleet compared to the "High" fleet scenario (new fleet, incorporating a significant proportion of regional jets was also analyzed). Even future Low fleet scenarios show significant levels of delays at Logan Airport. Based on actual experience and the Airside Project modeling, further regional carrier consolidation is not expected to have a significant impact on delay levels in Low fleet conditions. In high fleet conditions, when airline overscheduling is a major contributor to delays, regional carrier flight consolidation reduces delay levels. Massport proposes to monitor airline overscheduling conditions and to seek voluntary schedule adjustments from airlines to reduce delays caused by overscheduling. If airlines do not voluntarily comply, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.
192.4	Delay	Model	The consultants to the Community Advisory Committee to Massport (CAC) believe that delay has decreased substantially and cite FAA-produced data as evidence... there is precious little real data about actual delay as defined by FAA. There is not adequate information about delay to allow us to comment intelligently.	Sections 1.6 and 1.8 of the Supplemental DEIS/FEIR describe FAA and U.S. DOT measures of delay and their limitations, including historical data on delays at Logan Airpor and other major United States airports, and discusses the estimation and modeling of flight delays. Regardless of the delay measure used, Logan Airport has consistently been one of the most delayed airports in the nation, ranking sixth in total delays and third in arrival delays in 1998. Historically, FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. In fact, delayed flights at Logan Airport, as measured by the FAA, increased by 30 percent in 1998. Arrival delays, which would be directly affected by Runway 14/32, have risen steadily since 1994 and now Logan Airport is the third most delayed airport in the United States in terms of arriving flights. Because the FAA and U.S. DOT delay statistics only record historical delays, the FAA requires delay modeling when evaluating the future delay reduction benefits of airport capital improvements. The methodology used for the Airside Project provides a consistent and systematic estimate of flight delays caused by constraints at Logan Airport. The analysis based on this methodology indicates that: (1) flight delays at Logan Airport remain a significant problem and will become worse over time if no action is taken and (2) the Preferred Alternative can provide significant reductions in current and future delay levels.

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192.5	Analysis Assumptions/ Methodologies	Noise Model	The DEIS/R uses computer projections of noise, but the computer projections consistently understate actual noise as measured by Massport over field microphones.	Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix E of the *Logan Airport 1996 Annual Update).* In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft -- a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the *Logan Airport 1999 Environmental Planning and Status Report*). Massport continues to investigate possible causes for remaining differences (such as from hill effects) but believes the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure.
192.6	Analysis Assumptions/ Methodologies	Noise Model	The tripling of overflights predicted actually understates the shift in operations that will occur given the long experience with FAA control tower ignoring the PRAS whenever delay exists. Given Massport's projections of increased delay within 5 years, the utilization of Runways 15/33 and 9/27 is likely to more than triple. The lack of analysis of this actual increase in overflight likely makes the noise predictions further understated.	The simulation modeling performed for the Airside Project study analysis considers PRAS only when more than one available runway configuration has sufficient capacity to accommodate demand. There is no basis for the claim that the Airside Project understates the changes in overflights resulting from Runway 14/32.
192.7	Analysis Assumptions/ Methodologies	Noise Model	Land Use and Coastal Zone Impacts and Smart Growth are ignored – the DEIS ignores the impact of increased overflight (by a factor of at least 3!) on currently underutilized land in the Seaport district of Boston, and in Chelsea, Everett and Somerville.	The improvements to be implemented under the Preferred Alternative will reduce delay and enhance the efficiency of an existing airport. The improvements will be constructed on the existing airfield and will support the urban development needs in the area communities and are therefore consistent with Smart Growth policies and Massachusetts Coastal Zone Growth Management Principle #2 (Refer to Section 6.5 of the Supplemental DEIS/FEIR.). The areas that will experience overflights with the use of Runway 14/32 under the Preferred Alternative are the same areas that experience overflights under existing conditions. Flights using overwater routings will increase with the use of the Proposed Runway 14/32.

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192.8	Alternatives	Runway 14/32	The entire analysis assumes that Runway 14/32 will be used only in overwater approaches and departures, but Appendix I indicates that US statute makes that decision solely the province of the FAA. Such decision must comply with NEPA. But there is no guarantee that even a full EIS would be required to use the runway in both directions… there is no basis for confidence that the runway will be unidirectional. The DEIS/R contains no analysis of the noise and safety impacts on Jeffries Point, East Boston, Charlestown and Beacon Hill that would be caused by two-way operation of Runway 14/32. Failure to disclose the potential impact, and the lack of any disclosure of credible guarantees on this matter is a substantial flaw that requires that the Draft EIS/EIR be rejected as inadequate.	A bi-directional Runway 14/32 was not considered for a variety of operational and safety reasons. The unidirectional Runway 14/32 concept analyzed in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR evolved from earlier feasibility studies including the FAA's *Boston Logan Capacity Enhancement Plan* (October1992), which determined that a bi-directional runway was not a feasible option. State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Furthermore, the location of Runway 14/32 involves physical limitations that reinforce unidirectional use. The Hyatt Hotel and Conference Center, which is located 1,300 feet from Runway 14 and is 174 feet high, invades FAA approach surface glide slope requirements, thereby precluding arrivals from the west to Runway 14. Additionally, the lack of available taxiways to allow aircraft to reach Runway 32 prevents aircraft departures from Runway 32. Massport will reinforce its commitment to unidirectional use by including the intended unidirectional limitation as a mitigation measure. This designation will be reinforced through Section 61 findings that will be adopted by the Massport Board as required under MEPA. It is anticipated that any state and federal approvals will also strictly reinforce the unidirectional limitations intended for Runway 14/32.
192.9	Noise	Stage 3	The DEIS/R uses 1999 simulated information as the basis of comparison for predicted year 2010 impacts in a variety of scenarios. The federal law requires that phaseout of all non-Stage III aircraft by the year 2000, so certainly Logan, with its stricter noise rule, should be all Stage III aircraft by the year 2000. For this reason, the 1999 simulation should be run with an all Stage 3 fleet, in order to understand the true impact of the various alternatives, and should be used in particular to identify Section 4(f) impacts, for all park and historical resources currently affected by Logan or potentially affected. Because of the failure to identify the 1999 all Stage III exposure, the basic analysis of Section 4(f) impacts and noise comparison among alternatives is seriously in error…	Comparisons of the Action Alternatives to the No Action Alternatives for individual fleet scenarios are the appropriate basis for evaluation and are not distorted. Fleet composition within each individual forecast scenario remains consistent. The phase-out of Stage 2 aircraft will reduce the noise impacts from Logan Airport, producing benefits to surrounding communities. These impacts are discussed in the *Logan Airport 1999 ESPR* (previously GEIR). The 29 M Low Fleet scenario includes 22 daily operations in Stage 2 aircraft (depending on the alternative examined), which represent about 2.5 percent of the total daily jet operations in that fleet. (Refer to Table 6.2-1 of the Supplemental DEIS/FEIR). In the shift to a post-1999, 100 percent Stage 3 fleet, some of these aircraft would likely have received hushkits resulting in very little improvement in the noise of individual overflights (and hence, little improvement in DNL), and some were likely converted to Stage 3 airplanes. However, on balance, the total number of Stage 2 operations in 1999 is small, and a revised 29 M Low Fleet scenario would leave a significant number of hushkitted airplanes to dominate the exposure. For these reasons, it is estimated that the presence of the Stage 2 airplanes in the 29 M Low Fleet scenario overstates noise exposure by only a few tenths of a dB, which does not represent a material difference.

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192.10	Regional Transportation	Regional Airports	Massport owns Hanscom Field, an existing airport adjacent to Route 128, but no analysis is done of the potential share of commercial activity that Hanscom might absorb, and the net environmental impact on the Hanscom environment if military and general aviation activity were displaced. With no analysis of this alternative, the Draft EIS/EIR is substantially flawed and should be viewed as an inadequate basis for comment.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.
192.11	Alternatives	Peak Period Pricing	The overutilization of Logan airspace by regional carriers who use 40% of the airspace to accommodate 10% of the passengers is the central problem driving delay at Logan, but the only option explored to deal with this is a very weak form of peak pricing, with a very high "trigger" of 110 movements per hour. No sensitivity analysis is presented, to explore the impact of different "triggers" set at 105,100 or 95 movements per hour. Also, the analysis methodology...does not explore the possibility the flights will be consolidated into a smaller number of larger aircraft. For this reason the analysis both understates the delay reduction potential of this method and overstates its economic impact.	Logan Airport's normal operating capacity is approximately 120 operations per hour, and is available nearly 80 percent of a typical year. The use of a 110 operations per hour threshold in the illustrative PPP program, which is ten operations below Logan Airport's normal runway capacity, represents a conservative value and avoids understatement of the potential delay benefits of the policy. The possibility that PPP would promote flight consolidation in regional carrier markets is reflected in the analysis presented in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR. This analysis forecasts a reduction in flight frequency within many regional markets with the program in effect.
192.12	Alternatives	Peak Period Pricing	The likelihood that even a weak form of Peak Pricing would tend to preclude the high delay "high" scenario is not even mentioned, even though the delay avoidance benefits of the Low vs. High scenario are greater than the differences among the alternatives considered. Since Peak Pricing will tend to inhibit the profitability of redundant regional services, it seems likely that the Peak Pricing would preclude the High Scenario from occurring, and that it should be tried before any of the construction scenarios...	Additional analysis of PPP is set out in Section 4.5 of the Supplemental DEIS/FEIR. This analysis includes the High Fleet scenario. Demand management measures at other United States and international airports are discussed in Section 3.5.

Letter 192: Fred Salvucci, MIT, Department of Civil & Environmental Engineering
Private Citizens: Cambridge

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192.13	Alternatives	Non-Construction Alternatives	Other alternatives to control overscheduling such as "slotting" Logan at a reasonable number of movements per hour, using market measures to distribute the "slots" are not evaluated whatsoever.	Neither federal nor state scoping directives required an analysis of slot controls. Imposition of slot controls constitutes a federal policy that has been preempted to the FAA under federal law and is not within Massport's jurisdiction. PPP represents a market approach that should encourage the highest value services to use Logan Airport during periods of scarce capacity without the market disruption and other inefficiencies related to slot control. Congress determined tha the slot program has a number of significant problems. The U.S. DOT has analyzed options for reducing slot controls at airports. As a result, the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (AIR-21), which was enacted in March 2000, eliminates all slots at three of the nation's slot-controlled airports. Slots at the Chicago O'Hare Airport will be eliminated by July 1, 2002 and slots at New York LaGuardia Airport and New York JFK Airport will be eliminated by January 1, 2007.
192.14	Alternatives	Non-Construction Alternatives	Use of limited priority based on size of aircraft to reduce the impact of airfield delay is not considered.	The air traffic control system of the United States, which the FAA operates, is based on a first-come, first-serve policy. An change in this policy would require a major federal decision that would involve a major overhaul of the entire air traffic control system, including procedures, manuals, software, controller/pilot training, etc. The FAA is continually evaluating alternatives to increase efficiency of th national airspace system. However, future FAA initiatives will not eliminate the need for the proposed airfield improvements at Logan Airport. The FAA's national initiative will not prevent the decline in capacity under northwest wind conditions that occur at Logan Airport.
192.15	Alternatives	Non-Construction Alternatives	Simple "jawboning" of regional air carriers is a technique that might have substantial benefit, especially if accompanied by phase-in of Peak Pricing or lease restrictions to encourage movements toward an all-jet Logan.	As a mitigation measure, Massport will establish a Peak Period monitoring programs as outlined in Section 4.5 of the Supplemental DEIS/FEIR.
192.16	Alternatives	Peak Period Pricing	The effectiveness of the P.A.C.E. program in 1988 is not described or evaluated.	The impacts of the Program for Airfield Capacity Efficiency (PACE) are described and evaluated in Section 3.5 of the Supplemental DEIS/FEIR.
192.17	Alternatives	Taxiway Improvements	There are no alternatives considered to the Centerfield Taxiway proposal. It would appear that the threshold of Runway 4L/22R could be displaced substantially to the south, in order to increase the height of aircraft landing over the Bayswater Street neighborhood, reducing noise and increasing safety margin.	The threshold for Runway 22R is already displaced 845 feet to the south, which increases the height of landing aircraft by only 42 feet. Further displacement would not be a substitute for the benefits of the Centerfield Taxiway. Moreover, Runway 22R is used almost exclusively for jet and non-jet departures so further displacement would have a negligible effect on the impacts of landing aircraft traffic. The northern end of the Centerfield Taxiway will provide an alternate routing for those heavy jets that require the length o Runway 22L for takeoff, allowing them to avoid the queue on Taxiway November. The southern end of the Centerfield Taxiway allows arrivals on Runway 22L and Runway 27 to be routed more efficiently for crossing Runway 22R with reduced delays and minimized ground idling.

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192.18	Alternatives	Taxiway Improvements	It should be possible to consider replacing Taxiway November with a buffer ?? [sic] to protect the beach. Since the entire premise of the Massport airfield proposal is that the 4/22 runways will be utilized less, it is not clear why the centerfield taxiway is needed at all, or alternatively why a sanitized northerly ENV of runway 4L-22R cannot serve as the taxiway for the northerly portion in lieu of the "November" taxiway which adversely affects Constitution Beach.	Converting Runway 4L/22R north of Runway 15R/33L into a taxiway would cause a major reduction in the takeoff distance available on Runway 22R as well as in the landing distance on Runway 4L. When operating to the south, most departures would need to use Runway 22L instead of Runway 22R, which would mean significantly increased ground congestion, delays and associated environmental impacts. To the north, fewer arrivals would be capable of using Runway 4L, which would increase delays on Logan Airport's highest volume configuration.
192.19	Environmental Justice		The core [process] of the Executive Order, and the DOT implementing order of April 1997 ... was not followed.	The Environmental Justice analysis was significantly expanded in Section 6.8 of the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the Final United States Department of Transportation Order, and the Council on Environmental Quality's guidance on Environmental Justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations from the Preferred Alternative. TEST Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. Mitigation of the increased noise within the 65 dB DNL noise contour will be provided to affected communities in the form of residential sound insulation.
192.20	Noise	Soundproofing	The interpretation that soundproofing can mitigate, so that the impact can be denied is inappropriate.	The Final U.S. DOT Order on Environmental Justice directs FAA to determine whether its programs, policies and activities will have a disproportionately high and adverse impact on minority or low-income communities, taking account of mitigation, enhancement measures, and all offsetting benefit's to the affected populations, as well as the design, comparative impacts, and the relevant number of similar existing system elements in non-minority and non-low-income areas.
192.21	Noise	Soundproofing	...there is no disclosure in the draft EIS of how soundproofing can be achieved in low-income housing units where the structure may have other building code problems...	Federal requirements typically exclude the FAA from any responsibility to bring a building up to code when the structure is sub-standard but otherwise qualifies to participate in an airport-sponsored sound insulation program. However, to address impacts in particular projects, such as the proposed Airside Project, FAA has discretion to use grant funds to bring buildings up to code as part of the mitigation program to the extent such improvement are required to proceed with the sound insulation work. The mitigation program for the Airside Project includes use of grant funds for such purposes. For the eligible residences, the FAA will fund building code improvements, to the extent necessary, to implement effective sound insulation treatment.

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192.22	Noise	Soundproofing	There is no discussion of the kind of [soundproofing] program that would be required to make it work for non-owner occupied low-income housing.	Refer to response to Comment 192.21.
192.23	Environmental Justice		There is more discussion of the economic impact of Peak Pricing on Cape Air, and prediction of difficulty of access to Nantucket, Provincetown and Martha's Vineyard than there is in the entire Environmental Justice section!	The Supplemental DEIS/FEIR significantly expands upon the discussion of Environmental Justice presented in the Airside Project Draft EIS/EIR. Refer to response to Comment 192.19 and Section 6.8 of the Supplemental DEIS/FEIR.
192.24	Environmental Justice		The analysis of differential impact should be *comparative.* Alternatives such as Hanscom Field or Peak Pricing are likely to have NO adverse impact on low-income or minority populations. Moreover, low income people, who are less likely to fly, are less likely to benefit from any reduction in delay. But there is no comparison ol alternatives based on environmental justice concerns.	The Environmental Justice analysis in Section 6.8 of the Supplemental DEIS/FEIR complies with the applicable requirements of Federal Executive Order 12898, the Final United States Department of Transportation Order, and the Council on Environmental Quality's guidance on Environmental Justice. The Preferred Alternative will not have a disproportionate high and adverse impact on minority or low-income populations.
192.25	Environmental Justice		Whatever an appropriate decision might be *after* Environmental Justice consideration...The Executive Order and DOT implementation order are clear that Environmental Justice principles are to be considered at the earliest possible point in the process and occur before decisions are made. that has clearly not occurred in this draft EIS ...	Refer to response to Comment 192.24.
192.26	Environmental Justice		The television and radio (and newspaper) advertising program by Massport constitutes a major flaw in the environmental process and [is] a violation of environmental justice ...	Massport did not sponsor television, radio, or newspaper advertisements for the Airside Project. Massport disagrees with the other assertions in this comment.
192.27	Environmental Review Process	MEPA	The DEIS/R is so deficient and misleading that it should be rejected and "rescoped" ...The scope of the document was established in 1995, over 3 years ago.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the Draft EIR, dated May 7, 1999. The issues identified in the MEPA Scope for both the Draft EIR and Final EIR continue to be relevant. In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental DEIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of fifteen visual and written presentations from the Project's technical consulting team and other independent industry experts.
192.28	Environmental Review Process	NEPA	The DOT Implementing Order for the Executive Order on Environmental Justice was issued April 15, 1997...Environmental Justice principles are to be applied at the earliest possible time. These procedures were not followed...	Refer to response to Comment 192.24.

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192.29	Purpose and Need	Delay	Since by Massport information the northwest wind problem causes approximately 20% of airfield delay, and the remainder of airfield delay will grow to exceed current airfield delay within 5 years, this is much too narrow a problem definition to be serious, and appears to have been selected to predetermine a conclusion to build Runway 14/32.	While Massport cannot reduce delays caused by snowstorms, fog, and other severe weather conditions, it can affect delays that occur in VFR conditions. These delays are caused by a fundamental inadequacy in Logan Airport's airfield layout, *i.e.*, the lack of a third available runway in the northwest-southeast operating direction. When strong northwest winds force the airport to a northwest-southeast orientation, air traffic controllers lack a third available runway. If no actions are taken, the VFR component of delay will increase the fastest. The proposed unidirectional Runway 14/32 would produce immediate delay reduction benefits that would increase into the future as forecast activity levels grow. Under a near-term, 29 M Low Fleet scenario, the Preferred Alternative reduces annual delay by 28,000 hours. Under a longer-term 37.5 M High Fleet scenario, the Preferred Alternative saves 94,000 annual hours of delay. Delays caused by northwest winds represent a significant problem at Logan Airport, and one that can be addressed through the recommended construction of unidirectional Runway 14/32. Other elements of the Airside Project address other issues related to delay, airfield efficiency, and safety at Logan Airport. The Preferred Alternative was selected after careful analysis of operating and environmental considerations
192.30	Purpose and Need	Delay	Even all airfield delay is too narrow a problem definition, as it concentrates excessively on the airfield, to the exclusion of delays caused by deficiencies in the terminal configuration.	Refer to response to Comment 192.2.
192.31	Purpose and Need	Delay	The definition of airfield delay does not include analysis of delays caused by small aircraft in the fleet mix. The FAA safety procedures require increased separation when significantly different aircraft follow each other, affecting capacity and causing delay. There is no consideration of this issue, nor is any time dimension placed on the differential time required in transit by the current practice of using non-jets in regional markets. The DEIS/R does not include analysis of the constraint imposed by differential size.	The mix of large and small aircraft at Logan Airport and the resulting impacts on aircraft separation requirements are reflected in simulation modeling for this project.
192.32	Regional Transportation	Regional Airports	There is no analysis of the potential restructuring of regional air travel, as small jet services make direct flights from Green, Manchester, Portland and other regional airports more attractive than the indirect service of regional carriers to Logan to transfer to other flights.	Developments at the regional airports and their impacts on Logan Airport are described in Sections 2.3 to Section 2.6 of the Supplemental DEIS/FEIR. Massport considers Logan Airport to be part of a regional system of airports that includes T.F. Green/Providence, Manchester, and Worcester Regional airports. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of these regional airports. Greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport. The benefits of improved direct services at the regional airports have, in certain instances, reduced dependence on Logan Airport for connecting services. For example, Manchester Airport received hourly service to Logan Airport in the late 1980s, but receives no Logan Airport flights today. This reflects the availability of improved access to other hubs and major origin and destination markets from Manchester Airport.

Code	Topic 1	Topic 2	Comment	Response
192.33	Purpose and Need	Delay	Even all aircraft delay is too narrow a scope, focusing excessively on the interest of efficient utilization of aircraft. Passenger delay includes delay in processing ticketing and baggage for both enplaning and deplaning passengers. ... these delays clearly involve more passenger hours than the airfield-related weather delays, but they are borne by the passengers, not the airlines, and are not analyzed in this DEIS/R.	Refer to response to Comment 192.2.
192.34	Purpose and Need	Delay	There is no analysis of passenger delay in accessing Logan on the metropolitan area road and transit system. This system is congested, parking at Logan is limited by the Clean Air Act parking "freeze," and improvements in public transport access are lagging. This factor affects passenger and cargo delay and reliability, and appears to be affecting consumer choices to use Manchester or Green instead of Logan.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR assess potential improvements to Logan Airport's airfield that will reduce delay and enhance airfield efficiency and safety, as required by federal and state scoping directives.
192.35	Environmental Review Process	NEPA	Regional EPA proposed in its scoping comments of 1995 that a comprehensive analysis of the airport, including the (metropolitan) ground access and terminal capacity and its interrelationship with any airside proposals should be included. Unfortunately, the DEIS/R ignores the need for a comprehensive approach, and refers the reader to the Generic EIR, a state document which, among other problems, deprives citizens of protection of federal laws such as the NEPA requirement to analyze socio-economic as well as environmental concerns, Title VI (Civil Rights), Section 4(f), and the Executive Order on Environmental Justice.	The Draft EIS/EIR for the Airside Project responds to the FAA Scope as part of the Airside Improvements Planning Project Draft EIS/EIR process and responds to the MEPA Certificate, both which were developed through a public comment process. The ongoing state ESPR process provides information to the federal and state agencies and the general public on the environmental effects of existing and future operations at Logan Airport, on the cumulative effect of airport operations, and on the planning context for individual projects at Logan Airport. The GEIR/ESPR is specifically incorporated by reference in the Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR as a background document. With the GEIR/ESPR providing background information, the FAA called for a project-specific review, including a cumulative impact assessment, under its NEPA regulations, for the Airside Project. This two-level process has identified the cumulative environmental impacts of operations and projects at Logan Airport and has provided a proper foundation upon which the FAA has fulfilled its NEPA responsibilities.
192.36	Ground Transportation	Access to Logan	At the time of the scope of the DEIS/R was developed, Massport was proposing a "People Mover" to substantially improve transit access to the Blue Line, and the CA/T project was committed to a major upgrade in the Blue Line Airport Station, including cross-platform transfers in both directions. Now Massport and MassHighway have withdrawn these commitments, giving rise of the question, "How on Earth can Logan handle 50% to 100% growth in passengers with a parking freeze and no significant transit improvement in sight?"	The MBTA is developing a new Logan Airport Station to be located about 400 feet north of the existing Logan Airport Station. Massport is consulting with the MBTA on the project's design and operational elements. The new Logan Airport Station will include modern passenger amenities such as wide escalators, oversized elevators, and real-time flight information displays in the station lobby. It will also provide a convenient at-grade connection to the neighborhood, AITC Blue Route and Logan Airport, and may become a stop on the MBTA's proposed Circumferential Transit (Urban Ring) service. Massport has implemented an aggressive airport access program designed to increase the use of public transport modes and decrease the reliance on private automobiles to access Logan Airport. This program is described in the *ESPR*. The *ESPR* analysis indicates that Logan Airport can accommodate the projected growth.

Code	Topic 1	Topic 2	Comment	Response
192.37	Environmental Review Process	MEPA	In 1995, the Port Authority was talking about redeveloping Terminal A through a "privatization" mechanism. Today they have apparently concluded that will not succeed, but there is no clear timetable for the redevelopment of Terminal A, the most prominent terminal at Logan, and the most problematic. While that terminal is being redeveloped, the capacity to handle passengers will go *down* unless a successful mitigation strategy can be developed. Terminal A was to have been redeveloped with a shape designed to buffer noise impacts on the nearby Jeffries Point neighborhood. In addition, and with no increase in number of gates, rumors indicate that Massport now intends to abandon the noise buffer shape, and add gates. This would constitute "segmentation." A revised scope should include Terminal A redeveloped including any options.	An Environmental Assessment/DEIR for the redevelopment of Terminal A by Delta Air Lines was filed with the MEPA Office on May 31, 2000. The terminal retains the noise buffer shape that will reduce aircraft noise impacts on the Jeffries Point neighborhood. The proposed Terminal A satellite concourse, located parallel to Harborside Drive, will act as a sound barrier for the Jeffries Point community. The project received state environmental approval in late 2000.
192.38	Analysis Assumptions/ Methodologies	Delay Model	Most of the projections in the DEIS are based on these [1993] projections. The DEIS concedes that airfield delay at Logan actually went down since 1993, but there is no effort to analyze what happened, much less to correct the computer programs to incorporate this forecasting.	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport.
192.39	Alternatives	Runway 14/32	... experience shows that during delay conditions the FAA controllers ignore PRAS goals and utilize maximum capacity configurations, so the tripling of exposure to overflight predicted with availability of Runway 14/32 actually *understates* the likely reality. More realistic utilization estimates should be prepared, at least to provide a range of estimate.	The simulation modeling performed for the Airside Project study analysis understates PRAS only when more than one available runway configuration has sufficient capacity to accommodate demand. There is no basis for the claim that the Airside Project understates the changes in overflights resulting from Runway 14/32.
192.40	Analysis Assumptions/ Methodologies	Noise	Noise impact from aircraft is projected in the DEIS by using computer models, but citizens have complained for years that the noise levels measured by Massport microphones monitored in the field show that actual noise consistently exceeds the predicted levels.... In addition, these same models are used to predict noise consequences of the airfield proposals, so the predictions in the DEIS/R understate actual impact. The computer models should be adjusted to better simulate actual noise impacts.	Refer to response to Comment 192.5.
192.41	Analysis Assumptions/ Methodologies	Noise	... MEPA requested the preparation of 60 dB contours, ... 60 dB contours should be prepared and used in the analysis.	The DNL 60 dB contours and related data were included in Appendix L of the Airside Project Draft EIS/EIR and are also included in the Supplemental DEIS/FEIR.
192.42	Ground Transportation	Access to Logan	Credibility of environmental commitments has been undermined by MassHighway reneging on the Airport Station Blue Line commitments. In addition, the MassHighway revisions constitute a segmentation flaw in the airfield project. The MassHighway proposal should be suspended, and it and suitable alternatives incorporated into the revised scope.	The MBTA's Airport Blue Line Project is under control of a government entity over which Massport has no jurisdiction. After the submission of the Airside Project ENF, MassHighway issued a Notice Of Project Change for the Airport Blue Line Station, which documents the project's status and associated mitigation commitments.

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192.43	Environmental Review Process	NEPA	... based on these multiple flaws, the DEIS/R scope is so out of date as to be meaningless. It should be withdrawn and a new scope developed, consistent with Environmental Justice principles.	The Draft EIS/EIR for the Airside Project responded to the FAA Scope and the MEPA Certificate, which were developec through a public comment process. Over 400 comment letter were received on the Airside Project Draft EIS/EIR documen The Supplemental DEIS/FEIR responds to additional federal and state scoping directives, which were issued in response to the public comment letters on the Airside Project Draft EIS/EIR. Refer to response to Comment 192.27.
192.44	Purpose and Need	Airfield Capacity	Because of a variety of wind and weather conditions, reliability of Logan is much higher at frequency of less than 100 movements per hour, whereas it becomes very unreliable as utilization approaches the maximum capacity of close to 120 movements per hour. Yet the DEIS/R does not provide basic information to identify the reliability of Logan at 75, 85, 95, 105, 115 movements per hour so that the trade off between frequency and reliability can be understood.	The Airside Project analysis of PPP examined an operations threshold of 110 operations per hour, which is already below Logan Airport's normal operating capacity of 120 operations per hour. There is no legitimate operational justification for imposing a peak period surcharge at an operation level significantly lower than Logan Airport's norma operating capacity which is achieved 80 percent of the year without any delays. Even at 75 operations per hour, Logan Airport would be subject to delays from northwest win conditions. The Airside Project analysis in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR indicates that, with the Preferred Alternative, Logan Airport can accommodate existing and foreseeable future levels of demand without imposing a drastic administrative restriction to artificially revise Logan Airport's existing capacity.
192.45	Purpose and Need	Airfield Capacity	The further fundamental issue at Logan is the fact that approximately 40 percent of the airside capacity is used to accommodate small regional non-jets which carry 10 percent of the passengers...If substantial consolidation of regional flights could be achieved, Logan would operate at or below 100 movements per hour and be highly reliable.	The presence of small aircraft in the fleet mix is a reflection o Logan Airport's role as a regional hub for both local and connecting passengers from small- and medium-sized communities in New England and the northeast United States. Logan Airport's normal operating capacity is 120 operations per hour and is available approximately 80 percent of the time. When these high capacity configurations are available, current flight demand can be accommodated with minimal delay. Runway 14/32 is designed to prevent the drop of capacity that occurs during northwest winds and will increase the reliability and efficiency of the airfield.
192.46	Alternatives	Non-Construction Alternatives	[Suggests better use of Logan Airport by using a variety of operational restrictions include "jaw boning" on scheduling, peak period pricing, prioritization of larger aircraft, becoming an "all jet" airfield, or "slotted" airfield.]	Refer to responses to Comments 192.13 through 192.15.
192.47	Alternatives	Peak Period Pricing	... the analytical approach to analyzing the peak pricing seems totally flawed. The DEIS/R ... ignores the fact that the existence of even a weak peak pricing system would inhibit the "high fleet" scenario from developing at all, ... the differences in delay between high fleet and low fleet scenarios are greater than the differences in delay between the "with" and "without" Runway 14/32 within a given scenario. This leads to a conclusion that the introduction of even a weak form of peak pricing should occur immediately as suggested by EPA in 1995, so its effects can be evaluated and fine tuned.	PPP and Runway 14/32 are designed to address different causes of delay. PPP would target delays that result from airline overscheduling, while Runway 14/32 is designed to prevent delays that occur during northwest winds. Massport believes that the proposed Peak Period monitoring system would provide the necessary market signals to discourage airlines from scheduling above capacity. Refer also response to Comment 192.12.
192.48	Alternatives	Peak Period Pricing	The DEIS fails to report on the performance of the PACE program ...	Refer to response to Comments 192.16.

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192.49	Analysis Assumptions/ Methodologies	Noise Model	The noise analysis is inappropriate, systematically understating the likely average noise impacts of the introduction of Runway 14/32. While the DEIS predicts a tripling of overflights ... the model is constrained by PRAS goals. But experience has shown the FAA control tower will ignore PRAS goals whenever there is congestion, so even greater increases are likely.	The simulation modeling performed for the Airside Project study analysis considers PRAS only when more than one available runway configuration has sufficient capacity to accommodate demand. (Refer to Section 4.3 of the Supplemental DEIS/FEIR). There is no basis for the claim that the Airside Project understates the changes in overflights resulting from Runway 14/32. Even so, Massport and the FAA are working together to improve conformance with PRAS recommendations and, as a mitigation measure, Massport is proposing a PRAS monitoring system to provide greater analysis and insight into the conditions when PRAS recommendations cannot be met. Massport is also committing to publishing system reports in the *Logan Airport 1999 ESPR* (previously GEIR) and subsequent annual reports.
192.50	Environmental Review Process	MEPA	... the addition of Runway 14/32 clearly increases the noise affected population, and thus violates the 1987 environmental cap, and should be rejected on that basis alone.	For all the alternatives, the Airside Project analysis determined that the noise-affected populations, in both 1999 and in future years, are well below the cumulative noise exposed populations that existed in 1987.
192.51	Analysis Assumptions/ Methodologies	Noise Model	It is the increase in exposure of households in the 60 dB contour who represent the most significant worsening of noise conditions, without soundproofing, but these numbers are not calculated, and the 60 dB contours are hidden in an Appendix. The benefit of compliance with PRAS is exaggerated in the DEIS/R.	The FAA as well as the Federal Interagency Committee on Aviation Noise (FICAN, which includes among its members the U.S. EPA and HUD) still recognize a DNL of 65 dB as indicative of significant noise impact and DNL levels above 75 dB as inappropriate for residential use because they are so high. The Preferred Alternative helps reduce exposure at this highest level as well as at levels above 70 dB. Nevertheless, all member agencies acknowledge that community annoyance and complaints also occur at DNL levels below 65 dB. As a result, the 60 dB DNL contours are now shown throughout the Supplemental DEIS/FEIR, and the numbers of people within the DNL 60 dB contour *are* calculated and reported in tables such as 6.2-3 through 6.2-7, 6.2-18 through 6.12-21.
192.52	Analysis Assumptions/ Methodologies	Noise Model	In addition, the selection of 1999 and 2010 distorts the [noise] comparisons, since the phasing out of all Stage III aircraft is due in 2000, and make it more difficult to understand the effect of various proposals. Including a 2001 analysis would separate this effect.	Comparing the Action Alternatives to the No-Action Alternative within the context of each projected fleet is the only appropriate way to evaluate the relative impacts of each proposed action. This does not distort the conclusion as to the relative impact of each scenario; on the contrary, only in this way is it possible to judge the effects of each alternative on delay and flexibility of runway use and in turn examine the consequence of those factors on noise. That said, the 29M Low Fleet scenario, while initially developed as a forecast in the early stages of this *Airside Improvement Planning Project*, has turned out to be a reasonable approximation of the fleet existing in the year 2000. Though the 29M Low forecast scenario includes 22 daily operations by Stage 2 airplanes and it is now true that Stage 2 operations by aircraft greater than 75,000 pounds have been phased out of air carrier fleets in response to federal regulations, a number of those Stage 2 airplanes were simply hushkitted as opposed to replaced; their noise levels are only slightly below the noise of their Stage 2 predecessors.

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192.45	Purpose and Need	Airfield Capacity	The further fundamental issue at Logan is the fact that approximately 40 percent of the airside capacity is used to accommodate small regional non-jets which carry 10 percent of the passengers...If substantial consolidation of regional flights could be achieved, Logan would operate at or below 100 movements per hour and be highly reliable.	The presence of small aircraft in the fleet mix is a reflection of Logan Airport's role as a regional hub for both local and connecting passengers from small- and medium-sized communities in New England and the northeast United States. Logan Airport's normal operating capacity is 120 operations per hour and is available approximately 80 percent of the time. When these high capacity configurations are available, current flight demand can be accommodated with minimal delay. Runway 14/32 is designed to prevent the drop of capacity that occurs during northwest winds and will increase the reliability and efficiency of the airfield.
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192.48	Alternatives	Peak Period Pricing	The DEIS fails to report on the performance of the PACE program ...	Refer to response to Comments 192.16.

Letter 192: Fred Salvucci, MIT, Department of Civil & Environmental Engineering
Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
192.49	Analysis Assumptions/ Methodologies	Noise Model	The noise analysis is inappropriate, systematically understating the likely average noise impacts of the introduction of Runway 14/32. While the DEIS predicts a tripling of overflights ... the model is constrained by PRAS goals. But experience has shown the FAA control tower will ignore PRAS goals whenever there is congestion, so even greater increases are likely.	The simulation modeling performed for the Airside Project study analysis considers PRAS only when more than one available runway configuration has sufficient capacity to accommodate demand. (Refer to Section 4.3 of the Supplemental DEIS/FEIR). There is no basis for the claim that the Airside Project understates the changes in overflights resulting from Runway 14/32. Even so, Massport and the FAA are working together to improve conformance with PRAS recommendations and, as a mitigation measure, Massport is proposing a PRAS monitoring system to provide greater analysis and insight into the conditions when PRAS recommendations cannot be met. Massport is also committing to publishing system reports in the *Logan Airport 1999 ESPR* (previously GEIR) and subsequent annual reports.
192.50	Environmental Review Process	MEPA	... the addition of Runway 14/32 clearly increases the noise affected population, and thus violates the 1987 environmental cap, and should be rejected on that basis alone.	For all the alternatives, the Airside Project analysis determined that the noise-affected populations, in both 1999 and in future years, are well below the cumulative noise exposed populations that existed in 1987.
192.51	Analysis Assumptions/ Methodologies	Noise Model	It is the increase in exposure of households in the 60 dB contour who represent the most significant worsening of noise conditions, without soundproofing, but these numbers are not calculated, and the 60 dB contours are hidden in an Appendix. The benefit of compliance with PRAS is exaggerated in the DEIS/R.	The FAA as well as the Federal Interagency Committee on Aviation Noise (FICAN, which includes among its members the U.S. EPA and HUD) still recognize a DNL of 65 dB as indicative of significant noise impact and DNL levels above 75 dB as inappropriate for residential use because they are so high. The Preferred Alternative helps reduce exposure at this highest level as well as at levels above 70 dB. Nevertheless, all member agencies acknowledge that community annoyance and complaints also occur at DNL levels below 65 dB. As a result, the 60 dB DNL contours are now shown throughout the Supplemental DEIS/FEIR, and the numbers of people within the DNL 60 dB contour *are* calculated and reported in tables such as 6.2-3 through 6.2-7, 6.2-18 through 6.12-21.
192.52	Analysis Assumptions/ Methodologies	Noise Model	In addition, the selection of 1999 and 2010 distorts the [noise] comparisons, since the phasing out of all Stage III aircraft is due in 2000, and make it more difficult to understand the effect of various proposals. Including a 2001 analysis would separate this effect.	Comparing the Action Alternatives to the No-Action Alternative within the context of each projected fleet is the only appropriate way to evaluate the relative impacts of each proposed action. This does not distort the conclusion as to the relative impact of each scenario; on the contrary, only in this way is it possible to judge the effects of each alternative on delay and flexibility of runway use and in turn examine the consequence of those factors on noise. That said, the 29M Low Fleet scenario, while initially developed as a forecast in the early stages of this *Airside Improvement Planning Project*, has turned out to be a reasonable approximation of the fleet existing in the year 2000. Though the 29M Low forecast scenario includes 22 daily operations by Stage 2 airplanes and it is now true that Stage 2 operations by aircraft greater than 75,000 pounds have been phased out of air carrier fleets in response to federal regulations, a number of those Stage 2 airplanes were simply hushkitted as opposed to replaced; their noise levels are only slightly below the noise of their Stage 2 predecessors.

Code	Topic 1	Topic 2	Comment	Response
192.53	Alternatives	Reduced Approach Minima	Analysis of the Reduction in Landing Minimums is Misleading and Inadequate. The landing minimums on Runways 15 and 22 were deliberately held high pursuant to agreements with the City of Boston. The community's objective in negotiating these higher than normal decision heights was to discourage use of landing over populated areas during low visibility conditions, and to encourage instead the use of overwater approaches during low visibility conditions, by installing Category III instrument landing systems, with the lowest decision heights on the 4R and 33L overwater approaches. ... Category III ILS has yet to be installed on Runway 33L. The DEIS/R predictions of improvement of reliability during low visibility conditions is not disaggregated to identify the benefits attributable from improved instrumentation on runway approach 33L which the community supports, as distinguished from the decision height reductions on runway approach 15R and 22L, which the community opposes. ... [T]he community has always understood that low visibility conditions generally occur under low wind conditions, but the DEIS/R implies that wind direction is a factor in this proposal. No identification of the frequency of high wind/low visibility conditions, or data, is presented. Finally, the community concern with low visibility landings over populated area is with safety, and the anxiety caused by such operations in the residential population, but the DEIS/R treats it as a simple noise problem.	The reduced landing minimums do not change the approach path nor reduce the clearance between aircraft and the surface. They will increase airfield safety by allowing operations more directly into the prevailing wind and will help improve PRAS goal achievement. Low visibility is often associated with fog, especially for coastal locations such as Logan Airport, but precipitation or low clouds also restrict visibility.
192.54	Alternatives	Taxiway Improvements	The analysis of the taxiway proposals is inadequate...since the DEIS/R states that the intention of the package is to *reduce* utilization of the 4/22 runways, it is difficult to understand what delays are proposed to be alleviated.	The taxiway improvements are designed to improve ground movement efficiency and safety, and to reduce taxiing delays, thereby reducing associated noise and emissions. Chapter 3 of the Supplemental Draft EIS/Final EIR describes several operating situations that would benefit from these improvements. Unidirectional Runway 14/32 would allow more balanced runway use, reducing the use of the Runways 4/22 from 65 to 37 percent (37.5M Low fleet scenario).
192.55	Analysis Assumptions/ Methodologies	Passenger Forecasting	... there is no analysis to show what number of passengers will be able and willing to access Logan over the next decade so the air service needs can be verified, and the timing of improved access to Green Providence via rail, and high-speed rail to New York can be evaluated in the light of more severe growth and terminal access problems at Logan.	The range of air traffic and operations forecasts considered in the airside analysis allows significant variation in current and future passenger activity levels at Logan Airport. Potential diversion of Logan Airport passengers because of high-speed rail and other regional rail projects are addressed in Section 2.7 of the *Supplemental DEIS/FEIR*. The Preferred Alternative produces substantial benefits at current activity levels and these benefits increase as activity levels grow in the future. Massport has implemented an aggressive airport access program designed to increase the use of public transport modes and decrease the reliance on private automobiles to access Logan Airport. This program is described in the *ESPR*. The *ESPR* analysis indicates that Logan Airport can accommodate the projected growth.
192.56	Environmental Review Process	MEPA	[Asks that the appendices of the history of Logan be more comprehensive in detailing airport-related events that have impacted the community.]	The Draft GEIR published in December 1991 documented the development history of Logan Airport from its inception as a military facility to its status as an international airport serving the New England region.

Letter 192: Fred Salvucci, MIT, Department of Civil & Environmental Engineering
Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
192.57	Environmental Review Process	MEPA	Given the reliance on environmental commitments in the proposed Runway 14-32, a list of "broken promises" that undercut the credibility of such assurances is worthwhile. A) Airport Blue Line station (CA/T Commitment, but Massport did not defend the honoring of the commitments to cross-platform transfers and at- or below-grade highways, when Mass Highway removed the Transit improvements and substituted very high (36' and 53' high) highway ramps.) B) Airport buffer edge (not implemented) C) Free shuttle to South Station, added Logan Express service, PeopleMover to Blue Line to increase capacity by a factor of six (now broken). D) Flight tracks and PRAS E) Landing decision heights in bad weather F) Taxiway use regulation to restrain noise exposure at the northern end of the 4-22 runways. G) The blast fence at the northern end of the Runway 22R, which Massport intermittently proposes to remove.	FAA and Massport disagree with this comment.
192.58	Open Space/ Parkland	Noise Levels	... all Section 4(f) resources affected by current operations or proposed actions should be identified. Their noise exposure today and in 2001, within all Stage III fleet should be identified, to establish a new "Base Condition" based on existing regulation, and the impact of various proposals upon 4(f) resources identified. In addition, analysis to identify "all flexible planning to mitigate adverse impact should be carried out and presented.	The proposed improvements at Logan Airport will neither incorporate land from the Section 4(f) resource nor affect the normal activity or aesthetic value of a public park, recreation area, wildlife refuge, or historic site. Therefore, the Preferred Alternative does not constitute a use of Section 4(f) resources. In addition, the FAA has determined that there are no feasible or prudent alternatives to the Preferred Alternative that would achieve the delay reduction, safety, transportation, noise distribution, and other objectives of the Preferred Alternative. Therefore, even if the noise levels associated with the Preferred Alternative were determined to interfere with the normal activity associated with the identified Section 4(f) resources (which they do not), the FAA concludes that the sound insulation mitigation proposed for the affected Section 4(f) structures includes all possible planning to minimize harm from that increase in noise.
192.59	Cumulative Impacts		A revised DEIS/R scope should carry out an analysis of impacts on coastal zone and smart growth land resources in the South Boston Seaport area, Chelsea, Everett and Somerville.	Refer to response to Comment 192.7.

FAX TRANSMITTAL

Date : 5/4/99

LETTER 193

TO : Arthur Puglsey

OF: MEPA

FROM : Fred Salvucci

May 4, 1999

Memorandum

To: Vince Scarano

From: Fred Salvucci

Date: 5/4/99

Re: Summary of points discussed at April 29 meeting.

First I would like to thank you and John Silva for the time you took to meet with Anastasia Lyman and myself last Thursday. I thought it might be useful to summarize the major flaws in the Massport DEIS/R, which we believe make it inadequate to serve as a Draft EIS and require it to be revised substantially into a new Draft for public comment. In addition, we are urging that the revised Draft should drop further consideration of Runway 14-32, and summarize our arguments why this would be the most productive way to proceed.

Primary Deficiencies in the DEIS/R.

1) The likely and potential role of regional alternatives to Logan is not properly assessed in the DEIS. 193.1

a) The DEIS/R identifies passenger growth at Logan from an estimate of 29 million annual passengers for 1999 to a range of 37 to 45 million passengers in 2010.

b) The DEIS/R identifies 7.5 million passengers likely to be attracted to other regional options, including high speed rail, growth in Manchester and Green, and telecommuting, but it does not adjust the basic 37 to 45 million projection downward to reflect this growth. Such a revision would seem to lower the range to 30 to 37 million for 2010, as indicated in table 2.4-9, on page 2-37. However, all the delay estimates in figure ES-3 on page ES 19 and table 4.2-7 on page 4-11 *do not make any adjustment for regional alternatives.* 193.2

c) Further development of Worcester, as recently announced by Governor Cellucci and Massport, if it would attract 50% of its natural market, as allowed for Manchester, or 75% as allowed for Providence, should represent an additional 1 to 2 million passengers. The opening of rail service to Green should expand its "natural" market, attracting a larger share of passengers. Passenger rail service to Manchester could have similar effects; a substantial part of the outside of Rte. 128 metropolitan market, estimated as 28% of Logan's current market, would likely be attracted away from Logan by the combination of high speed rail, Green, Manchester and Worcester. 193.3

d) In the context of the "hassle factor" of getting to Logan, with several years of Big Dig construction, the necessary redevelopment of Terminal A, the high cost of parking at Logan, the limit on any growth in parking supply, it is reasonable to expect that the Massport DEIS substantially overestimates 193.4

the likely growth in Logan passengers, and fails to consider aggressive further regional options as an alternative. 193.4 (cont.)

The fact is that no one anticipated in 1995 the level of success which the regional efforts of FAA in partnership with the localities who want aviation growth might enjoy. This success is to the credit of FAA, but the DEIS does not adequately reflect the predictable impact of existing initiatives nor consider the potential of new initiatives at Worcester or Manchester.

2) The DEIS translates the number of passengers expected at Logan into a range of estimates using a "high" and "low" projection of regional movements, and analyzes the effect of the proposed Runway 14-32, the proposed added taxiway, and peak pricing. But the largest differences in projected delay are between the high and low scenarios, and the analysis does not consider the impact of the alternatives considered on the overall fleet mix, and the high or low scenarios. But based on the analysis in the DEIS the "overscheduling" of regional services will not occur with peak pricing, because the market incentive to oversupply with small aircraft will be diminished. Moreover, one might expect that construction of Runway 14-32 might lead to increased use of small aircraft, by improving schedule reliability of small aircraft in comparison to large, and perversely affect the total number of aircraft movements required to serve any given number of passengers. The failure to consider these effects result in underestimating the benefits of peak pricing, and overestimating the benefits of Runway 14-32, and is a substantial flaw. 193.5

3) There is very little information about actual delay at Logan, and how it has increased or decreased over the years. The CAC believes that delay had decreased at Logan by 18% from 1993 to 1998, based on review of FAA and DOT data, but there is no clear information in the DEIS. This is a substantial deficiency. Moreover, the 1988 PACE program is mentioned, but there is no description of what impact it had in less than a year, and no analysis of what impact it might have had if continued over a longer period. 193.6

4) There is no exploration of exemption or grandfather provisions to deal with any particular economic impacts in special markets such as the Cape, even though the regional office of the EPA specifically requested this analysis in 1995. 193.7

5) There is no clear analysis of the 10% of Logan passengers in regional non-jet services who consume 40% of Logan airspace capacity, and how this particular part of the market is likely to evolve given existing growth in regional air services, and how these trends might be expected to be affected by peak pricing and by the construction of Runway 14-32. 193.8

(A) If we estimate total annual passengers at 37 to 45 million by 2010, 10% of these would be 3.7 to 4.5 million passengers. The DEIS says that 2/3 of these are not destined for Boston, but are making connections through Logan to other destinations, which is to say 2.4 to 3 million through passengers.

(B) If the dramatic improvements in airline services to smaller regional airports continue, and allow 50% of these passengers to make direct flights, these represent 1.2 to 1.5 million passengers otherwise served by non-jet commuters who would use direct services instead. This would lower the 3.7 to 4.5 million to 2.4 to 3 million passengers in regional non-jet services, somewhat *below* current absolute numbers. Because these passengers would be expected to use non jets,. At current loadings of approximately 15 passengers per flight, a reduction of 1.2 to 1.5 million passengers would represent 80,000 to 100,000 flights, more than the difference between the 1999 low and 2010 37 million high scenarios! A conservative assumption might be that current regional non-jet frequency is maintained. If the 1999 estimate of 10% of 29 million represents 2.9 million passengers, in 197,000 aircraft movements of 15 passengers per aircraft, were to remain constant, the 37 million low scenario would be *further diminished* by 50,000 flights, and the 45 million high scenario would be diminished by 100,000 flights. Which is to say the potential reduction of regional non-jet flights at Logan due to strengthening of the regional capture rate of a hypothetical 50% of connections through, non-jet flights exceeds the aircraft movement relief identified in the DEIS for regional capture of air passengers who now drive to Logan, and the two numbers are additive!

(C) Congestion at Logan actually encourages airlines to improve direct service to regional airports in order to achieve improved equipment utilization, and encourages passengers to prefer direct flights to avoid the uncertainty caused by connection through Logan, in addition to the comfort and convenience of direct small and mid sized jet services, closer to home.

(D) If we consider the likely effect of peak pricing on these regional non-jet flights, above and beyond the flight reductions predicted by the DEIS due to cancellation of flights, and shifting to the off peak, one would expect that peak pricing would encourage passengers to use direct flight rather than routing through Logan, by providing a price incentive. In addition, peak pricing should produce an incentive to shift from non-jet to larger "small jets" scheduled less frequently, both to accommodate customer preferences for the superior aircraft and to respond to peak pricing. Essentially the peak pricing is likely to provide monetary incentives to airlines to produce (and passengers to prefer) improved regional services, instead of the congestion of Logan which now provides incentive for regionalization. 193.9

(E) By contrast, if Runway 14-32 is provided, an opposite incentive is introduced by giving small regional feeder service preferential on-time performance, at lower landing fees, but increasing delay for all the aircraft during the 80% of non northwest wind related delay. Additionally, by increasing the number of small aircraft at Logan, one would expect added delay due to vortex avoidance requirements, but that is not stated. 193.10

(F) There is no analysis of other regulatory means to encourage regional flight consolidation such as a "slot" system. Regional EPA explicitly requested such analysis in 1995, but the DEIS "stonewalled" on the issue by asserting that slots are anti-competitive. As practiced in New York, Washington and Chicago, slots may be anti-competitive, but that does not preclude considering a slot system to analyze potential reduction and noise abatement benefits. Additionally, slots could be distributed based on service criteria such as aircraft size, or a price auction in order to avoid anti-competitive effect, but no analysis was done to consider this. 193.11

(G) There is also no consideration of a system to manage delay whenever it occurs by prioritizing takeoff of larger aircraft over smaller. (with upset limits so that no aircraft is forced to wait more than a certain movement behind their "first come first served" place in line. Based on theoretical simulation, there appears to be substantial potential to reduce delay rates to both airlines and passengers, but the possibility is not considered. Such a system would also be expected to have a long range effect of encouraging direct service from regional airports to avoid Logan, and encourage consolidation of regional non-jet flights into a small number of flights in larger "small jet" aircraft. 193.12

6) There is no consideration of the ground access constraints at Logan, although the regional EPA specifically requested such an analysis in 1995. Given the Clean Air Act parking freeze at Logan, Logan cannot accommodate more auto access, so any passenger growth must occur by improved transit. This has two ramifications; 193.13

(A) For the 28% of Logan passengers originating in the Boston metropolitan area outside of Route 128, the attractiveness of regional alternatives such as Green, Manchester, or Route 128 will be substantially strengthened.

(B) The importance of transit improvements to properly serve the growing needs of the area within Route 128 is enormous, and totally inconsistent with Mass Highway's proposed reneging on improved access to the airport MBTA station, and foot dragging on Urban Ring service, and Massport's apparent indifference to this matter.

(C) Truck and auto access to the north and northwest, in particular to Chelsea and Everett, Revere, Lynn and the North Shore, are particularly problematic, and have been ignored in the current Mass Highway plans for Contract 8A which appear to make them worse.

7) The Massport DEIS does not follow the Executive Order on Environmental Justice. 193.14

(A) The tripling of overflight in East Boston and Chelsea and the Andrew Sq. section of South Boston and Roxbury clearly represents an enormous shift of overflight from overwater and/or middle income areas to low income and minority population areas, which should have triggered a process of identification of target populations, adverse impacts, alternatives, communication with affected groups, and adoption of all feasible alternatives to avoid adverse impact.

(B) In addition, the disproportionate impacts of Mass Highway's proposals for Contract 8A, which would include very high viaducts adjacent to existing and proposed parks and residential areas, adjacent to low income and minority neighborhoods, and the expansion of Logan Airfield into the "Robie" property, towards the same neighborhoods which are also adversely affected by Runway 14-32, compounds the Environmental Justice violation.

(C) Recent information indicates that Massport intends to abandon the design for the redevelopment of Terminal A previously agreed to with the community. That design provided a shape that would buffer noise from the Jeffries Point neighborhood and Porzio Park, and provided no additional gates. The new proposal, as yet not discussed with the community, provides no buffer of noise and added gates, and represents yet another case of segmentation and yet a further violation of Environmental Justice principles.

(D) In addition to "segmentation" issues, the application of Section 4(f) is flawed. The DEIS should identify every 4(f) park resource adversely affected by existing Logan operations and any proposals under consideration. Communication should be established with the stewards of such 4(f) resources (typically city or state park agencies, and the neighborhood people who use the parks) to identify any impacts, alternatives to avoid, and "all possible planning to mitigate" such impacts. 193.15

(E) The assertion in the DEIS that soundproofing constitutes mitigation and somehow preempts the need to conduct a 4(f) analysis or an Environmental Justice process is totally inappropriate. Soundproofing of houses is at best a very partial mitigation of airport noise. Soundproofing doesn't help the porch, the roof, the backyard or the city sidewalk or neighborhood park. The existing house soundproofing program has been difficult to implement with middle income home owners. There is no track record on how to make it work for low income tenants. Indeed, there are questions of whether it is effective at all due to difficulty in holding contractors accountable for their work. There is no way that a vague Massport commitment to "mitigate" through soundproofing can substitute for environmental rights neighbors 193.16

enjoy under NEPA, Section 4(f), Title VI, which are supposed to be *strengthened and facilitated* by the Executive Order on Environmental Justice. 193.16 (cont.)

8) For all the above reasons, we believe the Massport DEIS is totally inadequate and needs to be redeveloped as a comprehensive Draft EIS for comment, which includes the Mass Highway Contract 8A, includes the proposed relocation of "Park and Fly" and the proposed airfield expansion into the "Robie" area; and further includes the proposal to redevelop Terminal A, so that the inter-related and cumulative impacts of these inter-related projects can be evaluated in a proper Draft EIS consistent with Environmental Justice principles. 193.17

(A) We believe that the process outlined by John DeVillars is appropriate, where first a comprehensive identification of existing impacts and appropriate attempts to avoid or mitigate would be identified and then any further proposals by Massport can be evaluated in that context.

(B) We believe that a revised draft EIS/R, incorporating the Mass Highway 8A Contract, including questions of airport edge such as relocation of the Park and Fly and the expansion of Logan Airfield into Robie, the redevelopment of Terminal A, and various airfield proposals including peak pricing should reject Runway 15-32.

1) The primary efforts that will deal with Logan delays are more use of regional airports and high speed rail. Even with no airfield action, adjusting the Massport numbers to reflect the growing success in regional airport and rail options suggests that delays should decrease, so there is no crisis here. 193.18

2) The availability of Runway 14-32 is likely to undercut the benefits of regional airport improvements, by providing small aircraft better on time performance than large, and encouraging a high-fleet scenario. 193.19

3) Runway 14-32 involves such a massive shift in overflight of communities, particularly over high concentrations of low income and minority populations that it violates Environmental Justice principles. 193.20

4) The presence of Runway 14-32 plan option so influences the affected communities that it is impossible to focus attention on improved instrumentation of Runway Approach 33, and other airfield issues that might be amenable to solution, and Terminal A 193.21

redevelopment which is the most urgent matter facing the ability of passengers to use Logan with reasonable comfort and convenience. 193.21 (cont.)

5) There clearly are feasible and prudent alternatives to building Runway 14-32, indeed, we believe the runway is *counter productive* on delay. In any case, adverse 4(f) impacts can be avoided by a decision to not construct Runway 14-32, and make the injunction permanent 193.22

Again thank you for your time and attention. We would be happy to meet again to discuss this further.

Letter 193
Fred Salvucci
MIT, Department of Civil & Environmental Engineering
Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
193.1	Regional Transportation	Regional Airports	The likely and potential role of regional alternatives to Logan is not properly assessed in the DEIS.	An expanded and updated discussion of the regional alternatives is presented in Chapter 2 of the Supplemental DEIS/FEIR. Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport. By incorporating a broad range of current and future passenger traffic and aircraft operations scenarios, the airside analysis and recommendations encompass any reasonable future operating conditions at Logan Airport.
193.2	Analysis Assumptions/ Methodologies	Delay Model	...the delay estimates in Figure ES-3 on Page ES 19 and Table 4.2.7 on Page 4-11 do not make any adjustment for regional alternatives.	Variability in potential impacts from the regional airports on future conditions at Logan Airport is incorporated in the delay analysis through the use of a wide range of current and future passenger traffic and aircraft operations levels at Logan Airport. As a result, the recommendations contained in the Supplemental DEIS/FEIR are not dependent on a specific future environment at Logan Airport, but instead take into account a range of current and potential future passenger scenarios in addition to analysis of the current operating environment at the airport.

Code	Topic 1	Topic 2	Comment	Response
193.3	Regional Transportation	Regional Airports	...a substantial part of the outside of Route 128 metropolitan market, estimated as 28% of Logan's current market, would likely be attracted away from Logan by the combination of high speed rail, Green, Manchester, and Worcester.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR evaluate the T.F. Green/Providence, Manchester, and Worcester Regional airports and their potential impacts on Logan Airport. The regional airports are expected to accommodate an increasing share of the overall growth in air travel demand within the Greater Boston area. This will provide some relief to the growth pressures at Logan Airport. Nevertheless, the proposed Airside Project is necessary and provides clear benefits at current traffic levels. These benefits will only increase in the future, even as developments at the regional airports act to reduce the rate of future growth at Logan Airport. Successful development of the regional airports, enhancing their ability to attract passengers that originate trips from locations outside Logan Airport's core market area represents a key element in Massport's efforts to promote an effective and efficient regional transportation network.
193.4	Analysis Assumptions/ Methodologies	Passenger Forecasting	In the context of the "hassle factor" of getting to Logan; with several years of Big Dig construction, the necessary redevelopment of Terminal A, the high cost of parking at Logan, the limit on any growth in parking supply, it is reasonable to expect that the Massport DEIS substantially overestimates the likely growth in Logan passengers, and fails to consider aggressive further regional options as an alternative.	The Airside Project analysis compared the benefits and impacts of alternatives against a broad range of current and potential future activity levels at Logan Airport. A benefit of this approach is that the findings and selection of the Preferred Alternative were not dependent on a specific future condition, but reflect consideration of different scenarios. The analysis of comparative benefits for the alternative airside projects focussed on activity levels at 29 million and 37.5 million annual air passengers. These activity levels include diversion of up to 7.3 million passengers that could be absorbed by regional transportation alternatives. Current traffic trends at Logan Airport and the regional airports indicate that Logan Airport may not reach the 29 million-passenger forecast presented in the Draft EIR/EIR until 2002 or 2003. Continued air service expansion at the regional airports and the introduction of high-speed rail to New York in December 2000 is expected to further slow Logan Airport's passenger traffic growth. With these developments, Logan Airport may not achieve the 37.5 million passenger forecasts until after 2010, but rather closer to 2015. Regional alternatives are addressed in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. Increased use of regional alternatives will not prevent the substantial drop in capacity and resulting delays that occurs during northwest wind conditions.
193.5	Alternatives	Runway 14/32 Peak Period Pricing	...based on the analysis in the DEIS "overscheduling" of regional services will not occur with peak pricing, because the market incentive to oversupply with small aircraft will be diminished. Moreover, one might expect that construction of Runway 14/32 might lead to increased use of small aircraft, by improving schedule reliability of small aircraft in comparison to large, and perversely affect the total number of aircraft movements required to serve any given number of passengers. The failure to consider these effects result in underestimating the benefits of peak pricing, and overestimating the benefits of Runway 14/32, and is a substantial flaw.	Small aircraft can be accommodated on all the runway configurations used at Logan Airport. There is no basis to assume that the construction of Runway 14/32 would stimulate an increase in regional carrier operations. Additional analysis of PPP is contained in Section 4.5 of the Supplemental DEIS/FEIR. As a mitigation measure, Massport has proposed to implement a Peak Period Monitoring System to determine if airline overscheduling is emerging based on future growth in aircraft operations. Massport believes that initiation of this monitoring program will provide the necessary market signals to encourage carriers to make efficient use of available facilities at Logan Airport. Should the monitoring program indicate that overscheduling conditions are likely to develop, Massport has developed an action plan as described in Section 4.5 of the Supplemental DEIS/FEIR, designed to address overscheduling conditions at Logan Airport.

Letter 193: Fred Salvucci, MIT, Department of Civil & Environmental Engineering
Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
193.6	Analysis Assumptions/ Methodologies	Delay Model	There is a very little information about actual delay at Logan, and how it has increased or decreased over the years. ...there is no description of what impact...[the PACE program] had in less than a year, and no analysis of what impact it might have had if continued over a longer period.	Section 1.6 of the Supplemental DEIS/FEIR contains a discussion of the FAA and DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports. Chapter 3 of the Airside Project Draft EIS/EIR also discusses the delay analysis and the PACE program.
193.7	Alternatives	Peak Period Pricing	There is no exploration of exemption or grandfather provisions to deal with any particular economic impacts in special markets such as the Cape, even though the regional office of the EPA specifically requested this analysis in 1995.	Refer to Section 4.5 of the Supplemental DEIS/FEIR which includes an analysis of PPP with the inclusion of a conceptual small community exemption program. That program would be designed to protect greatly affected communities from losing access to the national transportation system without unnecessarily diluting the delay reduction benefits of PPP.
193.8	Alternatives	Peak Period Pricing	There is no clear analysis of the 10% of Logan passengers in regional non-jet services who consume 40% of Logan airspace capacity, and how this particular part of the market is likely to evolve given existing growth in regional air services, and how these trends, might be expected to be affected by peak pricing and by the construction of Runway 14/32.	The presence of small aircraft in the fleet mix is a reflection of Logan Airport's role as a regional hub for both local and connecting passengers from small- and medium-sized communities in New England and the northeast United States. Logan Airport's normal operating capacity is 120 operations per hour and is available approximately 80 percent of the time. When these high capacity configurations are available, current flight demand can be accommodated with minimal delay. Runway 14/32 is designed to prevent the drop of capacity that occurs during northwest winds and will increase the reliability and efficiency of the airfield.
193.9	Alternatives	Peak Period Pricing	Essentially the peak pricing is likely to provide monetary incentives to airlines to produce (and passengers to prefer) improved regional services, instead of the congestion of Logan which now provides incentive for regionalization.	Since 1996, eight out of ten new passengers in New England are using the regional airports instead of Logan Airport. The regionalization of aviation in New England is already occurring without PPP.
193.10	Alternatives	Runway 14/32	By contrast, if Runway 14/32 is provided, an opposite incentive is introduced by giving small regional feeder service preferential on-time performance, at lower landing fees, but increasing delay for all the aircraft during the 80% of non northwest wind related delay. Additionally, by increasing the number of small aircraft at Logan, one would expect added delay due to vortex avoidance requirements, but that is not stated.	The fleet mix at Logan Airport is driven by the markets that the airport serves and not by available runway configuration. The construction of Runway 14/32 would not promote continued investment in small aircraft, since air carriers make their decisions on system-wide utility and profitability. Runway 14/32 would dramatically reduce delays under northwest wind conditions when small and large aircraft must use the same runway for landing. Under other conditions, the small and large aircraft are generally able to land on different runways so delay is minimal. The effects of wake vortex separations on operations and delays are included in all simulations. The High and Low Operations scenarios reflect different assumptions on the numbers of smaller aircraft for a given future passenger level. It should be noted that current and recent activity is consistent with the Low Operations scenarios. This Supplemental DEIS/FEIR includes analysis of a RJ High Fleet scenario, which includes a higher percentage of regional jets in the fleet. Also, refer to response to Comment 193.5.

Code	Topic 1	Topic 2	Comment	Response
193.11	Alternatives	Other Non-Construction Alternatives	There is no analysis of other regulatory means to encourage regional flight consolidation such as a "slot" system.	Neither federal or state scoping directives required an analysis of slotting. Imposition of slot controls constitutes a federal policy that has been preempted to the FAA under federal law and is not within Massport's jurisdiction. PPP represents a market approach that should encourage the highest value services to use Logan Airport during periods of scarce capacity without the market disruption and other inefficiencies related to slot control. Congress determined that the slot program has a number of significant problems. The U.S DOT has analyzed options for reducing slot controls at airports. As a result, the Wendell H. Ford Aviation Investment and Reform Act for the 21st Century (AIR-21), which was enacted in March 2000, eliminated all slots at three of the nation's slot-controlled airports. Slots at New York LaGuardia Airport and New York JFK Airport will be eliminated by January 1,2007.
193.12	Alternatives	Other Non-Construction Alternatives	There is also no consideration of a system to manage delay whenever it occurs by prioritizing takeoff of larger aircraft over smaller.... Such a system would also be expected to have a long-range effect of encouraging direct service from regional airports to avoid Logan, and encourage consideration of regional non-jet flights into a small number of flights in larger "small jet" aircraft.	The air traffic control system of the United States, which the FAA operates, is based on a first-come, first-serve policy. Any change in this policy would require a major federal decision that would involve a major overhaul of the entire air traffic control system, including procedures, manuals, software, controller/pilot training, etc. The FAA is continually evaluating alternatives to increase efficiency of the national airspace system. However, future FAA initiatives will not eliminate the need for the proposed airfield improvements at Logan Airport. The FAA's national initiative will not prevent the decline in capacity under northwest wind conditions that occur at Logan Airport.
193.13	Ground Transportation	Access to Logan	There is not consideration of the ground access constraints at Logan, although the regional EPA specifically requested such an analysis in 1995.	The air passenger projections for the Airside Project are based upon the projections for the airport whether the Airside Project is implemented or not. Therefore, the Airside Project will neither positively or negatively affect the ground access situation at Logan Airport. Ground access patterns were studied in previous GEIRs and are discussed in the *1999 Logan Airport ESPR* (ESPR, previously GEIR). The ESPR was filed on December 15, 2000.
193.14	Environmental Justice	Cumulative Impacts	The Massport DEIS does not follow the Executive Order on Environmental Justice.	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the Final United States Department of Transportation Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative.

Code	Topic 1	Topic 2	Comment	Response
193.15	Open Space/ Parkland	NEPA	...the application of Section 4(f) is flawed. The DEIS should identify every 4(f) park resource adversely affected by existing Logan operations and any proposal under consideration. Communication should be established with the stewards of such 4(f) resources...to identify any impacts, alternatives to avoid, and "all possible planning to mitigate" such impacts.	Section 4(f) requires the identification of resources that would be used by any alternative under consideration. Therefore, the identification of all park and historic resources currently affected by Logan Airport is not required for a Section 4(f) Evaluation. There are no parklands, historic properties or sites, or other Section 4(f) resources on the airfield in the area of the proposed runway and taxiway improvements. There are also no parklands identified in those areas where the 65 dB DNL contour for the Preferred Alternative extends beyond the 65 dB DNL contour for the No Action Alternative (Alternative 4). Therefore, the Preferred Alternative will have no direct or indirect impact on parklands. Refer to Sections 5.3 and 6.3 of the Supplemental DEIS/FEIR for a discussion of parklands relative to the Preferred Alternative.
193.16	Noise	Soundproofing	The assertion in the DEIS that soundproofing constitutes mitigation and somehow preempts the need to conduct a 4(f) analysis or an Environmental Justice process is totally inappropriate. Soundproofing of houses is at best a very partial mitigation of airport noise. Soundproofing doesn't help the porch, the roof, the backyard or the city sidewalk or neighborhood park...There is no way that a vague Massport commitment to "mitigate" through soundproofing can substitute for environmental rights neighbors enjoy under NEPA, Section 4(f), Title VI, which are supposed to be strengthened and facilitated by the Executive Order on Environmental Justice.	The implementation of a sound insulation program for affected historic residences is the accepted FAA mitigation outlined in FAR Part 150. Refer to Sections 5.3 and 6.3 of the Supplemental DEIS/FEIR for a discussion of Section 4(f) resources relative to the Preferred Alternative. Also, refer to the new analyses of Environmental Justice in Section 6.8 of the Supplemental DEIS/FEIR, and the expanded discussion of proposed mitigation in Chapter 8 of the Supplemental DEIS/FEIR.
193.17	Cumulative Impacts and the GEIR	Landside Improvements	...we believe the Massport DEIS is totally inadequate and needs to be redeveloped as a comprehensive Draft EIS for comment, which includes the Mass Highway Contract 8A, includes the proposed relocation of "Park and Fly": and the proposed airfield expansion into the "Robie" area, and further includes the proposal to redevelop Terminal A, so that the inter-related and cumulative impacts of these inter-related projects can be evaluated in proper Draft EIS consistent with Environmental Justice principles.	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental DEIS to address specific issues identified by the FAA following input from an Panel consisting of six persons. At the FAA's direction, three Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Airside Project's technical consulting team and other independent industry experts. The other projects cited in this comment are not related to the Airside Improvements Project. Any impacts associated with those projects will be addressed in individual project filings, if required under NEPA and/or MEPA and also in the ESPR (formerly GEIR) process. The ongoing state ESPR process provides information to the federal and state agencies and the general public on the environmental effects of existing and future operations at Logan Airport, on the cumulative effect of airport operations, and on the planning context for individual projects at Logan Airport. The GEIR/ESPR is specifically incorporated by reference in the Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR as a background document.

Code	Topic 1	Topic 2	Comment	Response
193.18	Regional Transportation	Regional Airports	The primary efforts that will deal with Logan delays are more use of regional airports and high speed rail. Even with no airfield action, adjusting the Massport numbers to reflect the growing success in regional airport and rail options suggests that delays should decrease, so there is no crisis here.	The proposed Logan Airport Airside Project is necessary and provide clear benefits at current traffic levels. Massport has long recognized that service development and increased passenger traffic at the regional airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and use of other options, especially high-speed rail to Logan Airport's largest market, New York. Section 2.3 of the Supplemental DEIS/FEIR evaluates T.F. Green/Providence, Manchester, and Worcester Regional airports and their potential impacts on Logan Airport. The regional airports are expected to accommodate an increasing share of the overall growth in air travel demand within the greater Boston area. This will provide some relief to the growth pressures at Logan Airport but will not eliminate the need for airside projects.
193.19	Alternatives	Runway 14/32	The availability of Runway 14/32 is likely to undercut the benefits of regional airport improvements, by providing small aircraft better on time performance than large, and encouraging a high-fleet scenario.	Regional carriers that provide service to Logan Airport and the passengers they serve are an entirely different market than the airlines that and passengers that have generated tremendous growth at the regional airports over the past several years. As a result, regional carriers serving Logan Airport are unlikely to shift operations to the regional airports and the low-fare carriers that provide service from the regional airports are unlikely to shift operations to Logan Airport. Regional carriers serving Logan Airport carry a mix of local and connecting passengers. A significant number of passengers are either traveling to Boston or connecting to flights that are not available from the outlying airports. For example, service to Manchester would not be a viable alternative for a Provincetown passenger traveling to a location in downtown Boston. Likewise, service to Providence would not be attractive to a Provincetown passenger trying to reach Denver, since there are no nonstop Denver services at T.F. Green/Providence Airport. Market forces have been responsible for the shift in airport usage from Logan Airport to the regional airports and the induced growth at the regional airports. Regional airports have become attractive alternatives to Logan Airport because of airline decisions to increase the frequency and quality of regional airport services (i.e., jet versus turboprops), the availability of lower airfares, convenient access relative to Logan Airport, and increased public awareness of the regional airports. Until Southwest Airlines, Delta Connection and MetroJet introduced low-fare services into the region, the New England region had been one of the only regions in the United States without a significant low-fare carrier presence. The resulting stimulation of traffic at the regional airports consists of both induced demand and diversion from Logan Airport. This diversion results from a recapture of traffic within Manchester and T.F. Green/Providence airports primary markets that was previously using Logan Airport. Since 1996, when low-fare services were first established at T.F. Green/Providence Airport, eight out of ten new air travelers in New England have chosen to use the regional airports over Logan Airport.

Letter 193: Fred Salvucci, MIT, Department of Civil & Environmental Engineering
Private Citizens: Cambridge

Code	Topic 1	Topic 2	Comment	Response
193.20	Environmental Justice	Cumulative Impacts	Runway 14/32 involves such a massive shift in overflight of communities, particularly over high concentrations of low income and minority populations that it violates Environmental Justice principles.	There are no Environmental Justice violations as described in Section 6.8 of the Supplemental DEIS/FEIR. In fact, Runway 14/32 would reduce noise to those most impacted by noise. It would shift 75,000 flights over water, while reducing total number of nighttime flights. Additionally, by increasing the number of operations over water, Runway 14/32 would reduce the total annual hours of dwell and persistence over populated areas in accordance with short-term PRAS goals.
193.21	Alternatives	Preferred Alternative	The presence of Runway 14/32 plan option so influences the affected communities that it is impossible to focus attention on improved instrumentation of Runway Approach 33, and other airfield issues that might be amenable to solution, and Terminal A redevelopment which is the most urgent matter facing the ability of passengers to use Logan with reasonable comfort and convenience.	The Airside Project is designed to reduce delays and increase the efficiency of Logan Airport's airfield. Massport and individual airlines are currently undertaking redevelopment of the landside (*i.e.*, terminals, roadways, etc.) portion of Logan Airport. An Environmental Assessment/DEIR for the redevelopment of Terminal A by Delta Air Lines was filed with the MEPA Office on May 31, 2000. Each of these projects will provide important benefits and address immediate deficiencies and should not be delayed.
193.22	Alternatives	Runway 14/32	There clearly are feasible and prudent alternatives to building Runway 14/32, indeed, we believe the runway is counter productive on delay. In any case, adverse 4(f) impacts can be avoided by a decision not to construct Runway 14-32	There are no adverse Section 4(f) impacts associated with the Airside Project. The proposed improvements at Logan Airport will neither incorporate land from the Section 4(f) resource nor affect the normal activity or aesthetic value of a public park, recreation area, wildlife refuge, or historic site. Therefore, the Preferred Alternative does not constitute a use of Section 4(f) resources. In addition, the FAA has determined that there are no feasible or prudent alternatives to the Preferred Alternative that would achieve the delay reduction, safety, transportation, noise distribution, and other objectives of the Preferred Alternative.

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LETTER 194

Bcc: Arthur Pugsley@MEPA@EOEA
From: "Margaret Webster" <webster@fas.harvard.edu>
ubject: re file # 10458 EOA
ate: Thursday, April 22, 1999 15:16:25 EDT
tach:
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Priority: Normal
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Expires:
Forwarded by:

Dear Mr. Pugsley:

194.1 I am writing you as a Cambridge resident opposed to the new runway, 14/32, proposed by Massport. Studies show that this runway will triple air traffic in our area. Wouldn't it make a lot more sense to start work on a new AIRPORT instead: one that is located further inland, where it would disturb fewer residents and would have more room to expand? In recent travels everyone I have encountered numbers Logan among the worst airports in the country, particularly in that it is nerve-rackingly hard to get to.

Thanking you for your consideration,

urs sincerely,

rgaret Webster
17 Woodbridge Street
Cambridge, MA 02140

LETTER 195

KROLMAN
Presentations on the Go.

Krolman Corporation ▪ 65 Elm Street, Charlestown, MA 02129-2438
tel: (617) 242-0635 ▪ fax: (617) 242-1444 ▪ e-mail: krolman@msn.com

April 2, 1999

John P. DeVillars
Regional Administrator
United States Environmental Protection Agency
Region 1
John F. Kennedy Federal Building
Boston, Massachusetts 02203-0001

Dear Mr. DeVillars:

Re: Comments on the Proposed Scope of Work for Draft Environmental Impact Statement/Draft Environmental Impact Report on Logan Airside Improvements Planning Project

It is my understanding that the uni-directional use of proposed Runway 14/32 cannot be legally guaranteed by the Massachusetts Port Authority, the Federal Aviation Administration or the Commonwealth of Massachusetts.

Consistent with their proposed use, Massport has analyzed Runway 14/32 as a uni-directional runway only. However, to better satisfy the aims of the National Environmental Policy Act and the Massachusetts Environmental Policy Act. the scope of the EIR/EIS should address the possible future implementation of bi-directional use. 195.1

Yours truly,

Arthur Krolman, CFA
President

Letter 195
Arthur Krolman, CFA, President
Krolman Corporation
Private Citizens: Charlestown

Code	Topic 1	Topic 2	Comment	Response
195.1	Alternatives	Runway 14/32	Consistent with their proposed use, Massport has analyzed Runway 14/32 as a unidirectional runway only. However, to better satisfy the aims of the National Environmental Policy Act and the Massachusetts Environmental Policy Act. The scope of the EIR/EIS should address the possible future implementation of bi-directional use.	The Runway 14/32 concept under review in the Supplemental DEIS/FEIR allows unidirectional operations only (*i.e.*, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14 end. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32. The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. Refer to Section 8.5 of the Supplemental DEIS/FEIR regarding enforcement of unidirectionality of Runway 14/32.

LETTER 196

Elizabeth A. Aberg
22 Boatswains Way
Chelsea, MA 02150
(617) 889-1724

April 18, 1999

Mr. Arthur Pugsley
Massachusetts Environmental Protection Agency
100 Cambridge St.
20th Floor
Boston, MA 02202

RE: EOEA #10458

Dear Mr. Pugsley,

I am writing to urge your agency to reject the proposed runway 14/32 project at Logan Airport. The residents of the communities surrounding Logan Airport have not been given fair consideration in this matter and will suffer greatly if this expansion is allowed to take place.

The Draft EIS/EIR statement released by Massport and the FAA focuses on the flight "delay" problem at Logan and attempts to solve this problem with the construction of new runway (14/32). However, the report contains numerous deficiencies that fail to compare the benefits of alleviating delays to the true environmental, social and medical costs of the proposed airport expansion:

Noise Pollution Impact
The widespread broadening of flights over many neighborhoods will increase noise impact to intolerable levels. Noise can cause serious health problems. It acts as a biological stressor by eliciting a response from the brain's reticular activation system that prepares the body for "fight or flight". Neural impulses then travel throughout the central nervous system and influence perceptual, motor, cognitive, behavioral, glandular, cardiovascular, and gastrointestinal functions. Therefore, noise is thought of as a *major* threat to human health.[i]

Air Pollution Impact
Chemical pollution generated by vehicles within the airport area, such as planes and transport vehicles, as well as road traffic to and from the airport will increase to unacceptable levels with the planned expansion. The EPA Regional Administrator stated that the region is currently in serious violation of the National Ambient Air Quality Standards for ozone, and that *any* increased traffic generated by the airport will make the Commonwealth's job of attaining the ozone standard more difficult.[ii] 196.1

Construction Impact
The draft report maintains that construction period traffic during the 2000-2004 period will generate a daily average of 129 truck round trips (range 58-580/day). This increase in traffic load will go on for years and will add to the already overly congested roads that lead to and from the airport. This will disrupt the normal flow of traffic on affected roads causing traffic delays, increase traffic noise to neighboring communities as well as aggravate the existing pollution and particulate dust problem, and contribute to road erosion and structural damage.

Massport's reasoning for the construction of a new runway is to reduce flight delays. However, there is a legitimate question to ask:

Just how "delayed" is Logan Airport?
Conflicting figures from different agencies have been given - there is no consensus as to just what the exact problem is. The US Department of Transportation statistics concurs with Massport's data on flight delays. But

according to the FAA standards for calculating delays, Logan has only about 3% of its flights delayed[iii]. The
FAA sensibly does not account for delays of less than 15 minutes or those that end up in flight cancellation.
But, even if short delays are excessive, the US Department of Transportation confirmed that delays are not 196.2
unusual for major airports, even for state-of-the-art facilities like Denver's Centennial airport, which had 29%
of its flights delayed last year[iv]. According to FAA data, the delay situation at Logan has improved since 1993
and is essentially in equilibrium. In fact, Massport's Aviation Planning Director, Betty Desrosiers, admitted
that delays have declined in recent years as airport planners improved scheduling with airlines.

It is clear that the Draft EIS/EIR raises more concerns than it alleviates. Logan is a physically small inner-
city airport that has exceeded reasonable capacity. Expansion of Logan will only augment existing noise and
chemical pollution levels for nearby communities. Most troubling is the disproportionate, biased, and 196.3
significant increase in air traffic over low-income and minority communities of East Boston, Chelsea, Everett,
and Roxbury, which is a violation of the Environmental Justice Act.

It is time to stop all expansion at Logan Airport and explore other alternatives. The interests of Massport must not be allowed to prevail over the interests of hundreds of thousand of people in the affected area. 14/32 is a detriment to our quality of life and a threat to our health and safety.

Respectfully,

Elizabeth A. Aberg

Elizabeth A. Aberg

---

[i] D. Dennis Hansen, M.D. and Lee A. Sanders M.D., Ph.D. The Adverse Health Impacts of Airport Expansion with Particular Reference to Sea-Tac International Airport. Health Subcommittee of the Environmental Impact Committee of the Regional Coalition on Airport Affairs. 10/5/92. http://www.accessone.com/rcaa/health.htm.

[ii] Draft EIS/EIR vol. II:11.7

[iii] Stephanie Ebbert. Delays at Logan Seen as Overstated. The Boston Globe. p A1, April 3, 1999.

[iv] Yvonne Abraham. Massport and Foes Dispute Delays. The Boston Globe. p B1, April 4, 1999

Letter 196
Elizabeth A. Aberg
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
196.1	Air Quality	NAAQS	The EPA Regional Administrator stated that the region is currently in serious violation of the National Ambient Air Quality Standards for ozone, and that any increased traffic generated by the airport will make the Commonwealth's job of attaining the ozone standard more difficult.	Although hazardous air pollutants (HAPs) are not specifically addressed, Section 6.8 of the Supplemental DEIS/FEIR includes a discussion of public health. Because VOCs and PM_{10} emissions are lower with the Airside Project than without it, it can be concluded that from these emissions will also be lower with the Airside Project Alternatives, when compared to the No Action Alternative.
196.2	Delay	Model	[The DEIS overstates the delay problem at Logan.]	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. It includes a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport.
196.3	Environmental Justice	Impacts	Most troubling is the disproportionate, biased, and significant increase in air traffic over low-income and minority communities of East Boston, Chelsea, Everett, and Roxbury, which is a violation of the Environmental Justice Act.	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.

Bcc: Arthur Pugsley@MEPA@EOEA
From: "Peter Alachi" <palachi@lynx.dac.neu.edu>
bject: EIS - EOEA #10458, Against Runway
te: Wednesday, April 21, 1999 8:36:21 EDT
ach: Environmental Study.PDF
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Priority: Normal
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LETTER 197

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April 21, 1999

Dear Mr. Pugsley,

Enclosed is an Acrobat PDF file attachment of my Environmental Impact =
Statement regarding Logan Airside Improvements Project.=20

Massport has already spent close to $3 million in public funds on =
consultants and politically connected lobbyists to push for its airport =
ansion plan (Joe Battenfeld. Massport spent $3M to lobby for runway =
Logan. The Boston Herald. p1, April 14, 1999). And, we have just =
witnessed how quickly a generously funded business coalition with the =
obscure name of 'Citizens' for Efficient Regional Transportation, =
mobilized and picked up Massport's propaganda ads that tout the benefits =
of the new runway. This is an obtrusively obscene alliance between a =
public-sector agency, that is supposed to serve the interest of the =
people, and big business that shortsightedly doesn't mind running =
roughshod over everybody else in the name of 'profit'. Apparently, =
Massport doesn't mind mowing us down either. The Authority's spokesman, =
Jeremy Crockford, applauded these ads calling the first ad 'a good one' =
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the Commonwealth's job of attaining the ozone standard more difficult.=20  197.3

Massport purports the draft report to be a full disclosure document. =
But, it leaves many details out and obscures the major issues that can =
potentially affect public health which deserves full public scrutiny =
 nder The Massachusetts Environmental Policy Act (MEPA). As the project =
  uld significantly increase Logan's airside capacity, the environmental =
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stated that "the (Massport environmental impact statement) paints a =
fairly frightening projection for growth at Logan'' (Laura Brown. =
Conservation Group Not Sold On Plan for New Runway. The Boston Herald. =
P. 15, April 16, 1999).  In short, failure to see the environmental =
impact of the build option will condemn hundreds of thousands of local =
residents to living with deteriorating medical, social, and =
environmental conditions. Our communities have not been given fair =
consideration in this matter.

I respectfully submit that the permanent and long-term impact damage =
visited on local communities should not be brushed aside in favor of =
profit or for alleviating petty delays. And that any money earmarked for =
Logan expansion would be better spent on alleviating current levels of =
noise and chemical pollution felt throughout the local communities.=20

Sincerely,


Peter Alachi
22 Boatswains Way
Chelsea, MA  02150
(617) 889-1724


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<P></FONT><FONT face=3DGaramond>Sincerely,</FONT></P></DIV>
<DIV>&nbsp;</DIV>
<DIV><FONT face=3DGaramond>Peter Alachi</FONT></DIV>
<DIV><FONT face=3DGaramond>22 Boatswains Way</FONT></DIV>
<DIV><FONT face=3DGaramond>Chelsea, MA&nbsp;&nbsp;02150</FONT></DIV>
<DIV><FONT face=3DGaramond>(617) 889-1724</FONT></DIV>
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AIRSIDE IMPROVEMENT PROJECT

A DRAFT ENVIRONMENTAL IMPACT ANALYSIS

By

Peter Alachi, MS, Biology
palachi@lynx.neu.edu

Monday, April 19, 1999

TABLE OF CONTENTS

SUMMARY OF MASSPORT'S AIRSIDE IMPROVEMENT PLANNING PROJECT........1

SUMMARY OF PROJECT ENVIRONMENTAL DATA 3

RESPONSE NOTES...3

CONCLUSIONS 3

REFERENCES 3

SUMMARY OF MASSPORT'S AIRSIDE IMPROVEMENT PLANNING PROJECT

The Draft Environmental Impact Statement and Draft Environmental Impact Report (Draft EIS/EIR) considers the impact of five options on flight-delay reduction and weighs the environmental impact of each. The proposed schemes, called actions in draft report, comprise:

- Constructing and operating a 5,000-foot unidirectional runway (14/32) located at the southwestern edge of the airport for use over the water only. The runway length was selected over a 4,500-foot length in order to accommodate a greater proportion of the regional/commuter carrier fleet and therefore more effective in reducing delay (I:3-1).
- Constructing and operating a 9,300-foot Centerfield Taxiway between runway 4L/22R and 4R/22L.
- Reconfiguring, improving, realigning and extending other Taxiways
- Reducing approach minimums on some runways (15R, 22L, 27 and 33L) by providing precision approach guidance to a point closer to runway touchdown. This will reduce delays and enhance operational safety.
- Peak Period Pricing or landing fee surcharges imposed on carriers during peak flight activity levels and as a result of airline over-scheduling.

The planned project was picked from a list of 5 options or alternatives (I:ES-16 - Table 1).

TABLE 1 - SELECTION OF PROPOSED ACTIONS AND DELAY REDUCTION

Alternative	Proposed Action	Percent Reduction of Delay for Year 2010 per 37.5M Passengers (Low Fleet)	Percent Reduction of Delays for Year 2010 per 37.5M Passengers (High Fleet)	Status
1	All actions	-34.1%	-53.6%	Rejected
1A	All actions without Peak Period Pricing	-29.9%	-31.3%	Accepted
2	All actions without 14/32	-14.1%	-42.7%	Rejected
3	All actions (operational and administrative) but no build	-10.3%	-41.3%	Rejected
4	No actions - allows routine maintenance and annual minor improvements	-	-	Rejected

* Based on table 4.5-2 (I:4-30) and bar graph figure ES-4 (I:ES-19).

Peak Period Pricing was not considered since current flight activity levels and over-scheduling do not exceed current airfield capacity (I:3-39).

Construction traffic during the 2000-2004 period will generate a daily average of 129 (ES:ES-27) truck round trips (range 58-580/day). Routes 1A and the Ted Williams Tunnel will be used as the major gateways. Certain designated routes on State highways would "minimize the impact on local streets" (I:ES-29).

Runway 14/32 would be permitted to operate as a unidirectional runway with all arrivals and departures occurring over Boston Harbor. As a result 15% of total airport operations would shift from flight paths over communities to flight paths over the water (I:ES-4). Upon completion, the project will reduce impacts for the most severely noise-affected communities in East Boston, Revere and Winthrop (I:ES-30).

SUMMARY OF PROJECT ENVIRONMENTAL DATA

Logan Airside Improvements Planning Project (EOEA #10458) looked at 2 areas:

- Addressing Logan's delay problem
- Enhancing safety

The two plans will be achieved with *minimal* environmental impact (I:ES-5 - Table 2).

TABLE 2 - SUMMARY OF DRAFT EIS/EIR 'S ENVIRONMENTAL IMPACT AND MITIGATION

ISSUE	DRAFT EIS/EIR STATEMENT
Noise	1. 14/32 will provide more equitable noise distribution and mitigation measures to most affected communities. 2. Communities at 65 decibels will experience a noise increase of 2%. Soundproofing will be provided. 3. Proposed plan will not affect normal activity or aesthetic value of a public park, refuge or historic sites. 4. The Taxiway system will reduce ground noise.
Air Quality/Odors	1. Air quality will improve due to 14/32 added shorter delay periods, and the Taxiway system. 2. Ambient levels of Carbon Monoxide, Nitrogen Dioxide, and volatile Organic Compounds are expected to be well within the air quality standards and are below of all considered alternatives.
Terrestrial Vegetation and Wildlife Habitat	The runway and taxiway constructions will result in the total loss of 39.4 acres of vegetation, leaving behind a total of 440 acres. See also Table 5.4-1 (I:5-60) for a list of avian species within the Logan airfield.
Endangered and Threatened Species of Flora and Fauna	The construction of the Centerfield Taxiway between runways 4L/22R and 4R/22L will result in loss of upland sandpiper (Bartramia longicauda) habitat. A plan with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) will mitigate this impact.
Soils	The reportable concentrations of S1 and S2 soil categories were exceeded in some of the soil samples for arsenic, lead, and two polynuclear aromatic hydrocarbon compounds (I:5-71 and Table 5.6-1 - I:5-72)
Water Quality	Class SB water quality standards are being met under average conditions (Table 5.5-1 - I:5-66).
Wetlands	No federal or state wetlands occur within the airfield study area (I:5-58).
Construction Impact	The construction-related work will be alleviated through "initiatives to limit traffic, noise, and air quality impacts in surrounding communities."

RESPONSE NOTES

There are legitimate questions to be reckoned with as they pertain to nearby communities' expectations. Any Logan improvement should be done in a sensible manner that will not compromise the environment, impact further on our health, irreparably disrupt our lifestyles, or detract from our property values. The submitted report contains numerous deficiencies that fail to compare the benefits of alleviating delays and cutting airline costs to the true environmental, social, economic, and medical costs of the selected scenarios. This report weighs environmental and medical impacts as compared to delay impact.

• Noise Pollution Impact

1. One of the most frequent complaints of local communities' residents is noise. The FAA's threshold of 65 decibels does not accurately assess how many people are disturbed by aircraft noise. The National Resources Defense Council (NRDC) confirmed that Denver International Airport, despite the relatively few people living within its 65 decibel noise contour, receives the highest number of monthly noise complaints from outside this area[9]. Noise can cause serious health problems. It acts as a biological stressor by eliciting a response from the brain's reticular activation system that prepares the body for "fight or flight". Neural impulses then travel throughout the central nervous system and influence perceptual, motor, cognitive, behavioral, glandular, cardiovascular, and gastrointestinal functions. Therefore, noise is thought of as a *major* threat to human health[7].

   The constant roar from jet aircraft can seriously affect the health and psychological well being of children, according to a Cornell University study[8]. Gary Evans, a professor of design and environmental analysis in Cornell's College of Human Ecology concluded that there are health problems resulting from chronic airport noise, including higher blood pressure and boosted levels of stress hormones, which may have lifelong effects. Evans contends also that New York children living near an international airport tended to be poor listeners and did not read as well as matched children in quiet schools. Mark Lawrence, an East Boston resident, who currently lives in Florida, recalls[13]:

   > "I REMEMBER being scared out of a deep sleep as a child as a jet would pass over my house so close you could see the pilot's face.
   > I REMEMBER how each year as a student all my teachers would have to pause every 5 or so minutes to allow the screeching jets to pass.
   > I REMEMBER not being able to concentrate in school because of jet noise."

   As many as 115 flights an hour pass over communities north and south of Logan Airport. In a joint public meeting by Massachusetts Environmental Protection Agency (MEPA) and the Federal EPA, Elaine McGrath of Chelsea told the board that, "The communities are speaking with one voice and telling you it's *unbearable*. Massport isn't telling you that"[19].

2. No remedy was given for the structural damage due to low-flying aircraft vibrating homes, school buildings, monuments, and industrial infrastructures within the affected communities.

3. The following flight path map obtained from the Boston Globe shows the projected impact comparing 1997, and 2001 with or without the new runway.

One obvious problem with this map's projections is that 14/32 will not be completed by 2001. According to a Massport spokesman, Jeremy Crockford, the approval process alone could take two years[20]. But a less obvious issue revolves around the increased fleet capacity projected by 2010. The numbers are therefore meaningless since those communities that are promised a relief for 2001 will not see it materialize in time and will be drowned by an eventual increase in total flights that supercedes the current level. Furthermore, if the plan is implemented, there will be a disproportionate and exorbitant increase in flights over poorer communities such as sections of Chelsea, East Boston, Everett, and Roxbury. The latter fact triggered U.S. Representative Joseph Moakley to argue that the impact statement did not address the environmental effects of the new runway on minority and low-income people in Boston that was required by a 1994 executive order issued by President Clinton[15]. 197.4

4. The Harbor Islands recreational area will suffer significant noise impact. 197.5

- **Chemical Emission/Impact**

Chemical pollutants emitted include cumulative chemicals generated by vehicles within the airport area, such as planes and transport vehicles, as well as road traffic leading to and from the airport.

1. Since the pollution emission predictor uses 1993 as a contrast item, an overcrowded airport year and a peak year for delays, the predicted emission reductions for year 2010 are undoubtedly minimized to favor a lesser environmental impact. Furthermore, the model predicts minor gains in reducing the levels of pollutants in the environment. But, the proposed action model predictor uses alternative 1 to attain this analytical profile (IV:Tables EI1-1-EI1-4). Since plan 1 was rejected in favor of plan 1A, these data do not necessarily fit the report's final conclusions (see Tables 1 and 3 in this report). 197.6

2. The additional combustion of gasoline and oil will increase the total Volatile Organic Compounds or Hydrocarbons (VOCs) in the atmosphere. VOCs are considered to be photochemical pollutants; a concentration of 3 ppm can result in 0.1 ppm of photochemical oxidants, a class of pollutants that includes both hydrocarbon and nitrogen derivatives.

3. The EPA's regional administrator stated that "... the number of passengers using the airport is projected almost to double current levels by 2010" (II:1). The projected increase in passenger volume to 45 million by 2010 will have an adverse effect on the local transportation and air quality by increasing the overall level of ozone in the airport region and on roads leading to the airport. Reducing ozone precursors, which includes nitrogen oxides is necessary to help the State attain the health standards for ground-level ozone (smog). Nitrogen dioxide (NO_2) is a pollutant that in concentrations as low as 0.25 ppm for one hour can blanket the horizon with reddish-brownish haze. Smog formation is initiated by the photochemical decomposition of NO_2 to NO + O. The resulting oxygen atoms then react with the more abundant species O_2 resulting in ozone (O_3). Oxygen atoms and Ozone molecules are also highly reactive with hydrocarbons, and a variety of products are eventually formed, including alcohols, ketones and aldehydes. The eye irritation, which is a familiar feature of photochemical smog, is due to the presence of compounds such as formaldehyde and acrolein. Both NO and NO_2 can also react directly with unsaturated hydrocarbons resulting in Methyl Nitrate and Peroxyacetyl Nitrate (PAN), both of which are powerful eye irritants[23].

4. Local airport traffic will also add to the problem of Carbon Monoxide (CO) emission. CO is found at normal levels between 0.025-1 ppm. In major cities, it ranges from 10-50 ppm. CO reduces the ability of the blood to transport oxygen though the body. The resulting strain on the heart and lungs can be fatal. CO can also cause dizziness, blurred vision, and distorted perception of time.

5. Sulfur Oxides, which occur chiefly as Sulfur Dioxide, Sulfur Trioxides, Sulfurous and Sulfuric Acids, can damage vegetation, fabrics, metals, and ecosystems such as lakes and ponds. Levels of 0.25 ppm or above cause irritation to human beings. Concentrations between 0.08 and 0.1 ppm for any length of time are considered unhealthy. It takes usually about 5 ppm of SO_2 for 1 hour to cause irritation to human throat and lung tissue, with accompanying bronchial constriction. But in individuals who suffer from chronic respiratory diseases, a minor increase in the concentration of SO_2 from 0.1 to 0.2 ppm can cause them to start coughing and experience severe difficulties in breathing[23]. Sulfur Dioxide is a heavy

noxious gas that can very quickly combine with water to form Sulfurous Acid (H_2SO_3). Also, Sulfur dioxide can absorb a photon of light and becomes "excited" so that if it collides with an O_2 molecule, it forms sulfur trioxide (SO_3). This is much more toxic than SO_2 and has much more affinity to water molecules in the atmosphere or lungs where it forms Sulfuric Acid (H_2SO_4), a highly corrosive acid. SO_2 emissions were not conducted since, according to the draft report, airports are not identified as significant sources of these emissions (I:6-64).

6. In addition, Sulfur compounds, Nitrogen Oxides, Lead, and various reactive volatile hydrocarbons can form other chemical complexes that are deleterious to all forms of life. These forms include a barrage of toxic and synthetic compounds whose effect on health ranges from clear-cut to suspicious. For example, NO_2 can combine with reactive hydrocarbons to form a wide range of pollutants including PAN, a major reactive pollutant. Some of these compounds are mutagenic and lead to cancer. Substances known to be cardiovascular irritants can directly be linked to emphysema, asthma, chronic bronchitis and heart attacks.

7. Suspended particles or particulates are tiny bits of matter (technically less than 0.1 millimeter) floating in the atmosphere, such as diesel smoke, fine ash, and dust. Particles which are smaller than 2.5 thousandths of a millimeter can pass through the primary, non-specific immune defenses such as nose hair and mucous membranes and may cause illness. Over a period of years, these materials attack lung tissue and increase susceptibility to such diseases as tuberculosis and lung cancer. And in urban areas, these particulates are believed to be responsible for increased asthma attacks, aggravating existing heart and lung conditions, lowering resistance to infection, and breathing problems in children. There is a direct correlation between high particulate air pollution and risk of premature mortality from heart and lung disease. The NRDC estimates that at current levels of pollution, approximately 64,000 premature deaths from cardiopulmonary causes may be attributable to particulate air pollution each year. That represents 6.5% of all cardiopulmonary deaths, which total 986,000 per year[9].

8. Many suspended particles serve as niche sites for microorganisms and their spores, including potential human pathogens.

9. High concentrations of suspended particles can cause reduced visibility caused by absorption and scattering of light. Soiled clothing and soot-covered buildings are other symptoms that are all too familiar.

10. Mixtures of atmospheric pollutants may show synergistic interactions, so that more aggregate damage is done by even small amounts than otherwise be expected. For example, the growth of pasture grasses is suppressed more by a mixture of SO_2 and NO_2 than by that of either alone[1].

11. Benzene, dioxin, toluene, xylene, and formaldehyde are known to be toxic and carcinogenic even at minute concentrations. None were monitored individually in the draft EIS/EIR study. 197.7

12. Overall health problems due to noise and chemical pollution include mental health problems, cardiovascular disease, gastrointestinal disease, compromised immune response, pregnancy and birth defects, learning disabilities, respiratory problems, and cancer[7].

13. Table 5.6-1 (I:5-72) indicates that the reportable concentrations of S1 and S2 soil were exceeded in some of the soil samples for arsenic, lead, and two polynuclear aromatic hydrocarbon compounds (I:5-71). Lead is known to be toxic in trace amounts. S1 soil category applies to those soils where there is a chance for a high frequency and high intensity of exposure to the soil by children and adults. While most of the lead assimilated comes from food and drink, some is inhaled. The residence time of lead in the bones is 78 years, whereas that of blood and soft tissue is about 30 days[6]. Lead emissions were not assessed by the draft report (I:6-64). 197.8

Ultimately, the lack of sufficient epidemiological and long-term health impact analysis due to these pollutants on people in affected communities is troubling.

TABLE 3 - COMPARISON OF DRAFT EIS/EIR ESTIMATES OF MAJOR AIR POLLUTANTS

Pollutant	Total 1993 Levels of Baseline Emissions for Logan (kg/day)	Predicted Low-Levels for 2010 (Alt 4/No Action)	Predicted Low-Levels for 2010 (Alt 1 - All Actions)*	% change from 1993 Levels with No Action (Alt. 4)†	% change from 1993 Levels with Action (Alt. 1)†
Carbon Monoxide	16,043	14,355	13,976	-10.5%	-12.9%
Sulfur Oxides	N/A	N/A	N/A	N/A	N/A
VOC	3,666	2,572	2,383	-29.8%	-35%
Nitrogen Oxides	5,002	7,078	6,919	+41.5%	+38.3%
Particulate Matter	241	280	251	+16.2%	+4.2%
Lead	N/A	N/A	N/A	N/A	N/A

* No data was given for the actual project (Alt. 1A)

† Negative data indicate a decrease in pollutant level while positive data indicate an increase.

- Construction Impact

1. The report claims no more than 0.6% overall impact on daily traffic due to trucking to and from the airport construction sites (I:ES-29). But the use of Routes 1A and the Ted Williams Tunnel will surely exceed that limit as hundreds of daily trucks enter and exit these roads. Furthermore, as to what roads are these trucks using to get to the aforementioned gateways, the report purports that 'certain' designated routes on state highways should be used to 'minimize' the impact on local streets (I:ES-29).

2. The draft report maintains that construction period traffic during the 2000-2004 period will generate a daily average of 129 truck round trips (range 58-580/day). The expected increase in traffic load will go on for years and will add to the already overly congested roads that lead to and from the airport. This will disrupt the normal flow of traffic on affected roads causing traffic delays, increasing traffic noise to neighboring communities as well as augmenting the existing pollution and particulate dust problem, and contributing to road erosion and structural damage. Nighttime construction will also occur. Winthrop's Office of the Board of Selectmen noted in a letter to Secretary Trudy Coxe, the Executive Officer

of Environmental Affairs, that "Past experience with other Logan construction projects has demonstrated their capacity to severely interrupt sleep patterns" (II:17.6).

• Endangered and Threatened Species of Flora and Fauna

1. The draft report mentions the loss of about 37 acres of existing grassland (I:ES-5) which is described in a later section as a net loss of 39.4 acres of "mowed grass" (I:ES-25), leaving behind 440 acres of vegetation. Of the 39.4 acres lost, 28.5 acres is due to the taxiway improvements, there is a 9% reduction in existing upland vegetation.

2. The loss of vegetation will result in loss of Upland Sandpiper (*Bartramia longicauda*) habitat due to construction of the Centerfield Taxiway between runways 4L/22R and 4R/22L. There is a mitigation plan with the Massachusetts Natural Heritage and Endangered Species Program (MNHES) to save the Upland Sandpiper. Michael Ciaranca, Natural Resource Manager of the Massachusetts National Guard stated that "... you can't simply (physically) move these birds and their nests to a different habitat."[17] Scott Melvin, from MNHES, concurred with Ciaranca that the current bird population and its nests could not be relocated but added that another site at the Massachusetts Military Reservation (Cape Cod) could serve as a new habitat that might conceptually be beneficial for the birds[21].

• Delays

1. The draft report chose 1993, a year in which flights peaked and Logan was overcrowded, as a base year for statistical comparison. In the short term (circa 1999), 29 million passengers were chosen to represent the fleet's annual passenger load. While for the long-term (circa 2010 and beyond), 2 sets were selected: 37.5 and 45 million passengers. At each passenger volume two fleet scenarios were analyzed, representing low and high-range levels of operation (III:Appendix E, p1). The benefits of Alternative Actions 1 and 1A were estimated to provide the greatest level of delay reduction with plan 1 reducing delays by between 29.3% and 60.3% (I:ES-18, and I:4-30). The draft report states that "a comparison of Peak Period Pricing (between 1 and 1A) under near-term, low fleet conditions is only 2 percent" (I:4-30). Table 4.5-2 shows that to be true. But, given the time-line for completing the runway, 1999 is not a realistic goal. Interestingly, the same table shows how the 'no build' option 3 under a high fleet scenario (with either low or high passenger loads) is much better at reducing delays than the 'build' 1A alternative (10% better for a low passenger load and 6.5% better for a high passenger load - see table 4.5-2, I:4-30). The EPA predicts a doubling of passenger capacity by 2010 at Logan (II:EPA Letter 1 dated Nov. 13, 1995), and Massport sees a 35.5% increase by 2010 (29 to 45 million passengers, III:Appendix E, p15), in which case the proposed plan will do little to alleviate congestion. 197.9

2. The Michael S. Dukakis Administration in 1989 imposed a form of peak period pricing which dropped congestion dramatically at the airport[2], thus, putting doubt on the draft report's contention that Peak Pricing is not helpful.

3. The US Department of Transportation statistics concurs with Massport's data on flight delays. But according to the FAA standards for calculating delays, Logan has only about 3% of its flights delayed[10]. The FAA sensibly does not account for delays of less than 15 minutes or those that end up in flight cancellation. But, even if short delays are excessive, the US Department of Transportation confirmed that delays are not unusual for major airports, even for state-of-the-art facilities like Denver's Centennial airport, which had 29% of its flights delayed last year[11].

4. According to FAA data, the delay situation at Logan has improved since 1993 and is essentially in equilibrium. Massport's Aviation Planning Director, Betty Desrosiers, admitted that delays have declined in recent years as airport planners improved scheduling with airlines[10].

CONCLUSIONS

- Massport often hides behind Federal aviation rulings and ignores community pleas to provide relief from daily disturbances living next to the airport (II:9.1). Typically, the draft report gave little to no serious attention to harmful noise and pollution impacts on the people in local communities, including residential neighborhoods, schools, parks, homes for the elderly, monuments, plants, and historic and cultural land. The proposed runway would adversely affect the noise and air quality in surrounding communities and seriously prevent or hamper many redevelopment efforts currently underway.

- The widespread broadening of flights over many neighborhoods would increase noise impact to intolerable levels. Studies indicate that noise affects one's ability to concentrate and can cause sleep deprivation, resulting in potentially deleterious effects on health and well being[7]. James Maas, professor of psychology at Cornell University and author of "Power Sleep", warned that getting enough sleep is more important than diet, exercise, or any other factor in increasing people's longevity[12].

- The draft's conclusions are drawn based on data models that fail to analyze true health impacts or to assess meaningful noise measurements. In fact, the Director of the Environment Department of the City of Boston stated that "... none of the scenarios presented can be considered to provide significant reductions in environmental impacts from airport operations. In particular, the proposed runway 14/32, touted for its unidirectional over-water approach/departure, is only marginally effective at reducing noise" (II:11.1).

- The EPA Regional Administrator stated that the region is currently in serious violation of the National Ambient Air Quality Standards for ozone, and that *any* increased traffic generated by the airport will make the Commonwealth's job of attaining the ozone standard more difficult (II:1).

- While implementation of Peak Period Pricing was initially considered, the report claimed that "no US airport imposes a peak pricing system", and that "airline over-scheduling is not a significant contributor to delay under low fleet conditions or in the current or near-term environment at Logan" (I:ES-18). But, interestingly, the same report admits in a footnote that both New York and New Jersey Port Authorities apply a 'surcharge' to general aviation aircraft operating during peak hours. Furthermore, the Dukakis administration in 1989 imposed a form of peak period pricing which dropped congestion dramatically at the airport[2]. Recently, the Conservation Law Foundation weighed in against the runway plan, arguing that Massport could do more to alleviate flight delays by creating cost disincentives for airlines to fly at peak times[24].

- The Draft's attempt to 'divide and conquer' local communities by promising a balance in overhead flights is ill advised. In fact, the new runway and taxiway will allow the airport to grow beyond rational limits. Bennet Heart, a spokesperson from the Conservation Law Foundation, stated that "the (environmental impact statement) paints a fairly frightening projection for growth at Logan"[25]. Growth of Logan will augment existing noise and chemical pollution levels for nearby communities. Most troubling is the disproportionate, biased, and significant increase in air traffic over low-income and minority communities of East Boston, Chelsea, Everett, and Roxbury.

- The report often failed to reference the appropriate tables for the graphs shown. Given the amount of time we were allotted to provide a response, we spend precious time looking for raw data that were not referenced in the shown graphs (see bar graph ES-4: I:ES-19).

- It is clear from the data that there is no significant decrease in congestion or delays due to the proposed plan and that any minor decrease in delay is invalidated by the immense social cost to the neighboring communities. US Representative Michael Capuano wisely stated that "if 14/32 will not permanently reduce delays, we shouldn't build it. The detrimental impact on our neighborhoods is too great. The burden of proof is on Massport to explain why there is a need for 14/32 when it will drastically increase airplane noise in many communities and doesn't even represent a permanent solution to the problem."[16] Logan has reached its capacity. To obviate the build option, a regional solution should be adopted. It involves moving cargo traffic to regional airports, building a connector from Worcester Airport to MassPike, working to establish North/South rail link and services, and implementing Peak Period Pricing. Long term solutions should look into planning and building a regional airport with an eye on the origin-destination demand (Table 4).

TABLE 4 - LOGAN'S ORIGIN-DESTINATION DEMAND BY REGION

Region	**% of Logan's origin-destination**
Vermont	0.4%
Maine	2.8%
New Hampshire	7.4%
Connecticut	0.3%
Rhode Island	2.4%
Massachusetts, west of 495	8.8%
Massachusetts, between Rt. 128 and I-495[2]	28.6%
Massachusetts, inside Rt. 128 excluding Boston[2]	28.6%
Massachusetts, City of Boston	20.6%
Total	99.9

[1] Adapted from I:2-8 and Executive Summary Report:ES-10.

[2] Combined 57.2% of Logan's origin and destination passenger demand is drawn from these two regions.

- Massport purports the draft report to be a full disclosure document. But, it leaves many details out and obscures the major issues that can potentially affect public health which deserves full public scrutiny under The Massachusetts Environmental Policy Act (MEPA). As the project would significantly increase Logan's airside capacity, the environmental consequences would be extraordinary. Failure to see the environmental impact of the build option will condemn hundreds of thousands of local residents to living with deteriorating medical, social, and environmental conditions. These communities have not been given fair consideration in this matter.

- Given Massport's history at keeping promises[26], its current assurance[22] that runway 14/32 will be unidirectional is dubious at best (I:ES-4). The FAA and Massport can reverse this 'flight of fancy' promise at any time following runway completion.

- In the final analysis, Massport is putting a price on our heads. The Agency is gambling away the public's health in favor of alleviating what are mostly minor delays. As the level and cost of airport pollution climbs, Massport has made no apologies and has not addressed the long-term and cumulative impact of pollutants on our health and the environment in a satisfactory manner.

Massport's argument regarding the "Airside Improvement Project" is myopic: It concentrates more on the economics of cutting airline cost and business benefits but minimizes the tremendous environmental, social, and medical costs it is imposing on its neighbors. The true cost to society, in other words, is never measured properly. We respectfully submit that any permanent and long-term impact damage visited on local communities should not be brushed aside in favor of business 'profit' or for alleviating petty delays. And that any money earmarked for Logan expansion would be better spent on alleviating current levels of noise and chemical pollution felt throughout the local communities.

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Letter 197
Peter Alachi
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
197.1	Purpose and Need	Delay	I believe that 'profit' rather than 'delay' underscores the basis for this expansion.	The Airside Project analysis shows that the Preferred Alternative will significantly reduce the growth in airside delays compared to the No Action Alternative. Refer to Section 4.6 of the Supplemental DEIS/FEIR. Massport will continue to examine ways to make Logan Airport more efficient.
197.2	Air Quality	NAAQS	EPA Regional Administrator stated that the region is currently in serious violation of the National Ambient Air Quality Standards for ozone, and that any increased traffic generated by the airport will make the Commonwealth's job of attaining the ozone standard more difficult.	No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives.
197.3	Environmental Review Process	MEPA	Massport purports the draft report to be a full disclosure document. But, it leaves many details out and obscures the major issues that can potentially affect public health which deserves full public scrutiny under The Massachusetts Environmental Policy Act (MEPA).	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern.
197.4	Alternatives	Runway 14/32	...communities that are promised a relief for 2001 will not see it materialized in time and will be drowned by an eventual increase in total flights that supercedes the current level.	The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.

Code	Topic 1	Topic 2	Comment	Response
197.5	Open Space/ Parkland	Noise	The Harbor Islands recreational area will suffer significant noise impact.	The Boston Harbor Islands, while within the No Action Alternative (Alternative 4) 65 dB Day-Night Sound Level (dB DNL) contour, will have no noise increase with the Preferred Alternative. Refer to Section 6.3 of the Supplemental DEIS/FEIR for additional discussion of parklands relative to the Preferred Alternative.
197.6	Air Quality	Model	Since the pollution emission predictor uses 1993 as a contrast item, an overcrowded airport year and a peak year for delays, the predicted emission reductions for year 2010 are undoubtedly minimized to favor a lesser environmental impact.	1993 was adopted as the base year when the Airside Improvement studies commenced in 1994. The primary function of the Base Year analysis is to calibrate the airfield operation models and environmental impact models. The benefits and impacts of the action alternatives (Alternatives 1, 1A, 2 and 3) are assessed by comparing these not with the base year, but with Alternative 4, the No-Action Alternative. The planning scenarios for 37.5 and 45 million passengers represent a range of future activity at Logan Airport expected in the 2010 to 2020 time frame.
197.7	Air Quality	Model	Benezene, dioxin, toluene, xylene, and formaldehyde are known to be toxic and carcinogenic even at minute concentrations. None were monitored individually in the draft EIS/EIR study.	Current aircraft-engine emissions data do not allow accurate modeling of these pollutants. Although hazardous air pollutants (HAPs) are not specifically addressed, Section 6.8 of the Supplemental DEIS/FEIR includes a discussion of public health. Because VOCs and PM_{10} emissions are lower with the Airside Project than without it, it can be concluded that from these emissions will also be lower with the Airside Project Alternatives, when compared to the No Action Alternative.
197.8	Air Quality	Model	Lead emissions were not assessed by the draft report (I:6-64).	Lead, in general, is not associated with airport-related emissions.
197.9	Dalay	Model	The EPA predicts a doubling of passenger capacity by 2010 at Logan... and Massport sees a 35.5% increase by 2010 (29 to 45 million passengers...), in which case the proposed plan will do little to alleviate congestion.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.

Monika M. Corneille
26 Admiral's Way
Chelsea, MA 02150
617-261-8459

LETTER 198

March 10, 1999

The Honorable John Kerry
United States Senator
One Bowdoin Square, 10th Floor
Boston, MA 02114

Dear Senator Kerry:

STOP 14/32
Please take notice that I strongly support the residents who reside in the vicinity of Massport in protest against the proposed Runway 14/32. 198.1

I am urging you to examine your thoughts and to weigh the catastrophic consequences the proposed Runway 14/32 will impose on tens of thousands of residents throughout the regions of Chelsea, Revere, East Boston, Winthrop and others. Please also consider the impact on the ecology of the surrounding areas. At a critical time, where we must consider long term impact in an attempt to preserve not only our generation, but also our children's, the runway carries particular weight. We know that the ecological balance will be seriously affected everywhere in an enormously large region. In addition, we know that airplane noise levels will reach an all-time, intolerable high. The noise levels, as they exist now, have already caused serious physical and emotional damage to certain adults. Add the proposed runway, and most certainly many more adults, children, and large varieties of animal life will be affected. On top of the above, the entire region will be infused with additional toxins, be it from additional airplane exhaust, more ground transportation or anything else.

At the March 2nd Subcommittee Meeting on Transportation at Boston City Hall, Mr. **Blute** of Massport made it very clear that he has no interest in the personal welfare of the communities involved. He made it clear, simply by not mentioning any such words as: family life, succession, quality of life, and ecology. What he did emphasize, however, is that his **interest in its entirety is purely economic**. He used these words: more jobs, more business, more industry, being competitive, etc. He pointed out that tourism and commerce (the new convention center) will be seriously affected if Runway 14/32 is defeated. As to suggestions of alternative airports, he pointed out that the airport should not be further away than where it is now, that regional airports will not be utilized by the multitudes of tourists. It would be too painful for these people, and nobody would visit Boston any longer. Hence, revenue is lost. I believe that one has to live under certain

Thank you for your support in this vital life issue for our communities.

Sincerely yours,

Monika Corneille

Monika M. Corneille

cc: Mayor Thomas Menino
Senator Edward Kennedy
President Senator Thomas Birmingham
State Representative Eugene O'Flaherty
Chelsea City Council
Peter Blute
John Silva
Arthur Pugsley

Letter 198
Monika M. Corneille
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
198.1	General Opposition		...I strongly support the residents who reside in the vicinity of Massport in protest against the proposed Runway 14/32.	Comment noted.

John O'Connor
April 9, 1999

LETTER 199

Dear John,

For your information, I posted the following message on www.stop1432 under Sinergistic impacts, in response to Mark Lawrence's idea of collaborating in collecting the negative impacts these noise levels cause. I can be reached on 617-884-4232 or on e-mail under mcorneille@dttus.com at work or 3542@MSN.com at home.

Dear Mark,

I have been reading with great interest what you have to offer on the subject of the RUNWAY. I think that a collection of how the flying alarm clocks impact us is a very good idea. I am willing to collaborate on collecting harms and problems arising from noise and other pollution. Perhaps these will get someone's attention. I know that lots of people suffer emotional and physical trauma from all of these.

I have lived at my current address in Chelsea since 1987, having been fully aware that I live close to an airport. However, I have not been bothered by excessive noise until about four years ago. I had lived abroad for two years and during that time the picture changed. Ever since I repatriated, November 95, I have been making calls and writing letters to legislative bodies, Massport and the FAA.

Here is what I now experience. I now get anxiety attacks from the aggravation of the steady wake-ups and having to call Massport noise abatement early a.m., late p.m., and the middle of the night, only to receive a stupid answer such as "you have been affected by runway 33L, blah, blah, blah." Regurgitating things I already know. They also don't take down verbatim what we say to them. They monitor our comments for "quality control". I have made it clear to them that it is not quality control they monitor, but what we say to them is what they monitor, so that our anger gets curbed. We all know that if we threathen them verbally in our upset stages and something happens one day, it is us who the fingers will point to because we are already on record. As a normally non-violent person, I have been verbally aggressive and nasty to the personnel taking the calls. They know me by name and voice. My daughter lives in Jersey and drives a long way to bring the grand children to see me. THEY CANNOT SLEEP WHILE HERE - I AM NOW FORCED TO GO THERE IF I WANT TO SEE THE GRAND CHILDREN. I think that for sure is negative impact. 199.1

Let's bring these problems forth!

Regards, Monika Corneille Monika Corneille

Cc: Robert A. Durand
John De Villars

Letter 199
Monika M. Corneille
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
199.1	Noise	Impacts	[Current noise impacts in Chelsea are unacceptable.]	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-8 of the Supplemental DEIS/FEIR.

LOUIS P. DISANO
43 BREAKWATER DRIVE
CHELSEA, MA 02150 **617-887-0920**

LETTER 200

April 21, 1999

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street – Room 2000
Boston, MA 02202

Dear Mr. De Villars;

It is with deep concern that I write you this letter. I am a resident in Chelsea, Massachusetts. The current AIR(Airfield Improvement Report) is not in the best interests of citizens living around the city of Boston.

Let me first say that I am in favor of economic growth and improvement in the Transportation systems of Boston. I believe in the improvement of New England, The Commonwealth of Massachusetts and the communities in and around Boston. I have lived in Boston and it's surrounding cities since I came here in 1986 to attend college. I have settled in Admiral's Hill in Chelsea with a purchase of a Beautiful Town House for two years with one major problem: Pollution of airplanes landing and taking off from Logan Airport.

I am continually disturbed and awakened from 6:00 AM to 12:30 AM from noisy planes flying overhead. My house shakes most of the time and I have a large double pane picture window with a huge crack across its width. This is a fact. Anything that can make these disturbances more frequent is completely unacceptalbe!

Any proposal must have the endorsement of the surrounding communities. The current Proposal is not adequate for the following easons: 200.1

1. FAA rules and guidelines were not followed. 200.2
2. Current data and studies were not taken into consideration
3. The originators of the proposal either have their own agenda or did not 'look outside the nine dots' and consider alternative ideas such as:
    1. A second major airport like: NY, LA, DC, Dallas, Houston, Chicago, SF/Oakland, etc.... 200.3
    2. Use of Hanscom Field Airport
    3. Regional Rail Transportation or other Modes of Transportation

This is very important to me as well as my neighbors. I ask for your help in making sure that our well being and safety are taken into consideration. I believe the politicians (Celluci, Birmingham, etc...) have been sold on this idea by big corporations and Massport. We need a Champion! Please! Before any more damage is done!

Very Truly Yours;

Louis DiSano

Letter 200
Louis P. DiSano
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
200.1	Environmental Review Process	FAA/NEPA	The current proposal is not adequate for the following reasons: FAA rules and guidelines were not followed	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. This document addresses FAA rules and guidelines.
200.2	Analysis Assumptions/ methodologies	Base year	Current data and studies were not taken into consideration.	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and to provide context to the delay problem at Logan Airport. The appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project is a comparison of the Preferred Alternative to the No Action Alternative, not a comparison of the Preferred Alternative to the base year.
200.3	Regional Transportation	Regional Airports/Passenger Rail	The originators of the proposal...did not... consider alternative ideas such as: 1. A second major airport... 2. Use of Hanscom Field Airport 3. Regional Rail Transportation or other Modes of Transportation	Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Hanscom Field's potential service area overlaps with the service areas for several airports that already have the necessary infrastructure for commercial service. These airports are the Hanscom Field, T.F. Green/Providence, and Worcester Regional, all which have had or are undergoing major improvements to their terminal buildings, other landside facilities and airfields. A second major airport is not a solution to the current delay and congestion problems at Logan Airport. The Proposed Project to reduce delay and enhance safety at Logan Airport must be implemented in the near term to address current and future operating conditions. Chapter 2 of the Supplemental DEIS/FEIR provides discussion of the entire region's air transportation system and includes a discussion of alternative modes, specifically, high-speed rail and the extent of Massport's active involvement in this area. Refer to response to Comments 6.6 and 6.7.

Home 91 Crest Ave.
Chelsea MA 02150-2154
Tel. (617) 887-2247

6 A.M.Sunday, March 7th,1999

LETTER 201

Secretary of Environmental Affaitrs
Attention MEPA Office
Mr. Arthur Pugsley - EOEA No. 10458
100 Cambridge Street
20th Floor
Boston, MA 02025

John C. Silva
Manager, Environmental Programs
Airports Division, ANE -600
New England Region
12 New England Executive Park
Burlington, MA 01803

Betty J. Desrosiers
Director, Aviation Planning
& Development
Massachusetts Port Authority
One Harborside Drive , Suite 200S
East Boston, MA 02128-2909

Re: MassPort's Draft EIS/EIR (Logan Airside Improvement Planning Project ("Project")

The major obstacle to harmonious conflict resolution is the inadequacies of verbal (oral & written) communication ,e.g.:

I) each side unwittingly using identical terms for quite different meanings; with the consequence that both sides are partially correct and partially incorrect. But each side is only aware of their "correct " position and quite oblivious to, or tend to deny, their "Incorrect" points and the opposition's "correct" points.

II) Ambiguous terms which are crystal clear to one side but unclear, confusing, to the other.

Example of I above::

For rhetorical purposes a possibly theoretical case: a Chelsea City Councilor claims that Massports' predicted decibel contours have been and are wrong. Theoretical reality.: Massport opponents privately get decibel readings > 100. Massport claims 70. Opponents are using individual readings. Massport is using decibel averages. Maybe some readings did exceed 100 decibels but others were only 50 so average is 70. Both sides correct within their own context but incorrect in their opponents.

Examples of both I and II II above: A) unidirectional, B) capacity, C) quality of life.

A) Unidirectional - (Massport's meaning: "over the water,") Yet "unidirectional's" liability is its inevitable collateral bi-directionality; i.e.,the aviation version of "What goes around, - comes around.," "What lifts off. - must land." except for NASA space probes. But what lifts off 14 can't land there. It has to land on 9/27 or 15/33 Conversely what lands on 32 can't lift off there but also must do so on 9/27 or 15/33. That is the source of the increased flights over land.

Incidentally, "over the water" only solves the problem for densely populated areas off 9/27 and 15/33. But spend an hour on Long Island in the harbor when Logan is using 15 and 27 and you will experience the same debilitating effects as the densely populated areas. The only difference is that the population of Long Island is 201.1

1) homeless,
2) Substance abusers
3) Pine St. Inn annex
4) Boston Fire Dept. Training area
5) Boston Police Dept. firing range.

So much for relative "quality of life"

B) Capacity

1) FAA - 200 operations/ hour 2) Massport- 120 operations/hour 3) Opponents - current operations/ hour (A strict interpretation of the last criterion would mean that Logan was at capacity from the day it launched its first flight.)

C) Quality of life. How does one evaluate this? Is qualiity independent of quantity? or are they interdependent? e.g infrequent incursions on tranquility might not unduly desecrate a given "quality of life" whereas perpetual disruptions would completely destroy it.

Is this a dichotomy? or is there a transitional zone? And if so, how do you deal with it?

The above questions plague the controversy, yet need to be resolved to the satisfaction of all parties.- an extremely complex and frustrating task Hopefully the above makes a contribution to this challenge.

Respectfully submitted. Charlie Ferguson
Charlie Ferguson

Letter 201
Charlie Ferguson
Soldiers' Home
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
201.1	Noise	Runway Use	"over the water" only solves the problem for densely populated areas off 9/27 and 15/33. But spend an hour on Long Island in the harbor when Logan is using 15 and 27 and you will experience the same debilitating effects as the densely populated areas.	The Boston Harbor Islands, while within the No Action Alternative (Alternative 4) 65 dB Day-Night Sound Level (dB DNL) contour, will have no noise increase with the Preferred Alternative. Refer to Section 6.3 of the Supplemental DEIS/FEIR for additional discussion of parklands relative to the Preferred Alternative.

Re: Hanscom/Logan

6 A.M.., Wednesday, April 14th, 1999

LETTER 202

My qualifications for speaking to the above titled subject are:

I flew a single engine land, tail wheel, fabric covered plane, naturally no de-icers, about 4 times/ year for 5 years from Lansing,Mich, across S. Ontario from Port Huran, Mich.-Niagara Falls.Invariably I hit lake effect weather in Ontario, blizzards in winter and cumulo-nimbus electrical storms the rest of the year

Twice I was forced down in Ontario pastures , fortuneately scaring cattle out of the way when landing and taking off. However, while studying my air charts and trying to determine my position the cattle would come and lick the fabric with their coarse tongues.I was afraid they would rupture it. .

Regardless, that was how I learned, not by trial & error, there was no room for error, but just dumb luck, how to jump a plane off a short field. Off course I had already learned in the same fashion, how to make a forced landing in short space.One of them was in late March with a wet snow falling. The snow loaded the leading edge of my wings so drag overcame lift. I could give it full take-off throttle and orientation but it would just mush along in level flight.

Another time I practically flew into the mouth of a hangar at Schenectady, NY, cutting the throttle and touching down rods from it. After refueling, I man sat on the tail while 2 others clung to the wing struts and they walked me a few 100 yards down the runway and turned me around, so I wouldn't ground loop.The man got off the tail , I gave it full throttle, the tail lifted off, the wingmen let go and I rose backwards like a hot air balloon, waving to my handlers as I rose. At 600' I made a U-turn and was on my way.

But I miscalculated. I neglected to allow for the fact that I would fly out ahead of the 70 mph tail wind, which I did shortly after take-off, over the Berkshires. My destination was Marlboro, but by the time I arrived it was too dark to land safely so I diverted to Hanscom, making my 1st ever landing there at night I lacked a radio and navigation lights so they never even knew I came in . So much for my flight experience

Both Hanscom and Logan squander their respective facilities Planes which don't require the full runways should only be allowed one (1) take-off and landing/day; i e., they could be based at those respective fields if that was convenient for their owner/operators, but do their business elsewhere.

There are 15, give or take a few, alternate regional ports which can handle probably at least 1/2 the traffic at
both Hanscom and Logan , Beverly/Danvers, TewMac, Lawrence, Nashua, Minuteman in Boxboro, Ft Devens?
despite Industrial Park and active military training base, could it still handle "touch & go's"?, Fitchburg, Long Hill? in 202.1
Bolton, Sterling, Marlboro, Grafton, Norwood, Fall River, Otis and S Weymouth

Even discounting the de-commisoned segment of the ex-US Naval Training Station in S Weymouth, most
of the field and enough runway to handle smaller planes exist in Abington/Rockland. It is claimed that facility could
interfere with Logan traffic. How did it manage when it was an active Naval Training Station?. or have planes grown
larger and need more maneuvering space?.. Even so, it must be a mighty close call because it is not much closer to 202.2
Logan than Hanscom, which bears no such complaint.

Bedford Depot on the old Bedford/Fitchburg rail line is 1.5 mi. from Hanscom Active Lincoln Station with trains running to N Station frequently during rush hours, and regularly in between on the Fitchburg line, is < 5 mi. from Hanscom Numerous options; bus shuttle service to both Bedford Depot and Lincoln. Three (3) Large Huey type passenger helicopter and Hover Craft routes; from Hanscom to Logan, and 1 loop each S & N in the 128-495 corridor

Establish 2-way, incoming and outgoing, transfer stations at Goose Bay & Gander. Newfoundland, Guantanamo Bay, Hawaii and Anchorage ,AL.where U S arriving passengers could be Customized, i e pass customs, sorted for the appropriate destination, i e. Hanscom or Logan , and passengers departing H/L could be sorted for those respective transfer stations. .

Only Jumbo Jets, Huge heliocopters and Hover Craft would use Logan The verticals, i e , helicopters and Hover-Craft, could have their own vertical tube flight paths in the dead spaces between runways Would narrow tunnels under the runways for access to these vertical tubes be possible, or would the runways collapse under the impact of the Jumbo Jets? If so I believe thre is sufficient space to locate these "tubes" where no runways would require crossing.

Re: Hanscom/Logan

Conducting "touch & go's" at Hanscom is courting disaster! Not at Hanscom, but elsewhere. On a long runway you can make 2 "touch & go's" in 1 pass. Also the pilot surrenders control to the tower so s/he is not responsible. But once these pilots get their "wings" they will be operating primarily in and out of non-controlled ports, thus making them responsible for their own flight paths and those of other planes using the same field. They need to know the "rules of the air" and how to apply them. They won't learn that at Hanscom as long as the tower provides all this for them. They will only learn it thru experience at the non-controlled ports. Thus it follows that all "touch & go" practice should be done at the non-controled fields and not at Hanscom.

To summarize; only planes requiring the Hanscom and Logan long runways are allowed regular flight service at these 2 Massport Fields. Everyone else is allowed one (1) take-off and landing/day if they wish to be based at H/L but conduct their business at the respective alternate ports. . 202.3

Two (2) final ?'s which Massport should answer are:

1) Whatever became of the STOL (Short Take-of and Landing) Eastern Air Lines experiment of '69-'72?

2) What was the cause of the precipitous drop in activity at Worcester? e..g., why did it originally thrive if access is so poor? Was it the Mass. Pike giving quicker access to Boston? Wouldn't want history to repeat itself; i.e., revive Worcester only to have it wilt again like flowers in periodic droughts.

Respectfully, Charlie Ferguson
Charlie Ferguson
Soldiers' Home
91 Crest Ave
Chelsea, MA [illegible]
[illegible]

Letter 202
Charlie Ferguson
Soldiers' Home
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
202.1	Regional Transportation	Regional Airports	[Massport should divert flights to]... Beverly/Danvers, TewMac, Lawrence, Nashua, Minuteman in Boxboro, Ft. Devens....	These airports are equipped to handle only general aviation activity, which represents 5 percent of Logan Airport activity. Most general aviation activity at Logan Airport is corporate jets and the destination of the passengers is downtown Boston.
202.2	Regional Transportation	Regional Airports	It is claimed that [South Weymouth] could interface with Logan traffic. How did it manage when it was an active Naval Training Station? ..or have planes grown larger and need more maneuvering space?... Even so, it must be a mighty close call because it is not much closer to Logan than Hanscom, which bears no such complaint.	Massport has no jurisdiction over the development, operation or use of infrastructure at airports other than Logan Airport, Hanscom Field, and Worcester Regional Airport (as of January 15, 2000). Massport plays no role, however, in the decisions of private airlines regarding air service routes or service levels. As proprietor of Logan Airport, Massport's primary responsibility is to supply, operate, and maintain Logan Airport's infrastructure which includes the runways, taxiways, terminal buildings, parking facilities and access roads. As a recipient of federal airport grants, Massport must adhere to grant covenants that require it to operate Logan Airport in such a way so as to ensure access and availability for public use on fair and reasonable terms and without unjust discrimination.
202.3	Regional Transportation	Regional Airports	[To reduce congestion Massport should require]...only planes requiring the Hanscom and Logan long runways are allowed regular flight service at these 2 Massport Fields. Everyone else is allowed one (1) take-off and landing/day if they wish to be based at H/L but conduct their business at the respective alternate ports.	Refer to response to comment 202.1.

April 11, 1999
200 Captains Row
#101
Chelsea, MA. 02150

LETTER 203

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge St.
Boston, MA.02133

Dear Mr. Durand:

I am opposed to the runway 14/32 expansion at Logan Airport. The time has come to "share the wealth" with other, wealthier communities like Lexington, Bedford, and Concord. Instead of building another runway at Logan, other sites should be used. I will not support any politician who panders to the wealthier communities. 203.1

Sincerely yours,

Patricia Grasso

Patricia Grasso

Letter 203
Patricia Grasso
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
203.1	General Opposition		I am opposed to the Runway 14/32 expansion at Logan Airport.	Comment noted.

LETTER 204

February 28, 1999

Secretary Robert Durand
c/o MEPA
100 Cambridge Street
Boston, MA 02202

RE: **Runway 14/32 EIR Public Comment**
Kowalczyk - 37 Winnisimmet Chelsea

Dear Mr. :

As a Resident and Home Owner in Chelsea, my specific request is concerning the environmental burden borne by my resident community. You are aware of the local traffic patterns and noise generated by the proximity of the MASSPORT's Logan Airport. I am requesting that the following be addressed in the EIR prior to approval:

- Local Traffic Patterns - The volume of additional traffic generated by the airport expansion should be specifically quantified and impacts on local traffic patterns should account for the fact that Chelsea bears the burden of the economic and time savings most commercial operators use in determining routing. Accommodations for the new tunnels and the central artery depression will have little impact on reducing traffic flow through Chelsea. Please include considerations for accelerating the approval for the Haul Road around Chelsea. 204.1

- Noise - The quantification and monitoring of noise will have little effect on any decision to expand the runway once the approval is given. Tangible mitigation of noise must be included in the EIR which specifically addresses the impact to our community. Recommendations for noise attenuation such as sound proofing windows or regional traffic pattern control to provide relief though allocation of fly over patterns during specific times are two opportunities to share environmental burdens. 204.2

My appeal to MASSPORT lacks the extensive documentation other opposition groups may have amassed during the EIR process. My appeal is with MASSPORT's conscious to respect communities such as Chelsea which will bear the burden of Project 14/32 while greater Boston realizes the economic benefits. MASSPORT is empowered with the public trust, the conscious of the common good. Rules and regulations not with standing, MASSPORT is faced now with an increasing balance of political and economic compromise. The EOEA faces the same pressure.

The economics of large public sector infrastructure is not new to engineers. What is new is the realization that environmental burden can be quantified. Subjective impacts such as vehicle traffic, noise, and air quality assume real dollar value. Historically these quality of life issues have succumbed to lack of technical measurement and political fillerbustering. Today as result of continuing public outcry to quantify the values assigned to these burdens, public agencies are less likely to compromise and endorse projects for mutual exchange among more politically savvy representatives. Today an educated public presents their own engineering opinions and requires increased accountability for the once sacred cow of best engineering judgement.

Apparently the message has been already been received by individuals who have expressed their opposition to MASSPORT's plans such our local representative, the respected Preston G. Galarneau, Jr.. Be that as it may, we have a long way to go before the values of environmental burden are equally shared and any proposal for a second airport within the Hub area is considered seriously. The underlying theme of "Jobs, Jobs, Jobs" has a way of influencing the most unbiased of candidates and in the end it will be our community leaders and representatives who decide and decide they will based on MASSPORT's and EOEA's negotiated concessions.

My opinion of the expansion plans for MASSPORT's runway 14/32 is one of many who have attended public meetings and written to you. But I am not empowered with the authority of decision. You are the authority. You are our conscious, our vested partner in the millennium to come, our overseer. You will decide the impact of the future environmental risk Chelsea will bear.

Understand full well that we are a community already burdened with environmental compromise - noise, traffic, air quality, parking, and sewerage. You and no one else will present your best engineering judgement of the values these burdens bear on our future quality of life. We all know your values will fall far short of any value Chelsea can express at this time. No one can measure the price of a compromised quality of life. We can only ask for our share of environmental equity. If history is any indication, the plans for any environmental relief follow a far different approval process when supported only by special interest groups lacking the driving economic pressure which industry will use to lobby approval of project 14/32. Chelsea has no other option than to lobby EOEA to make the mitigation proposals an integral part of the project approval itself. No other plan will be acceptable. Separating environmental equity from the economics of our regional politics will not be tolerated. If we are to suffer for the greater Boston Regional common good then let us be compensated for our burdens here and now with the approval process for 14/32. 204.3

Consider your options and know this, 'if EOEA's politically compromised understanding of the current environmental burdens borne by Chelsea is less than MASSPORT's economic gain then rest assured like our forefathers who boarded the British ships and tossed the tea into the harbor - the Residents of Chelsea will do the same on MASSPORT's runway'.

Thank you again for your time and understanding of our matters.

Very truly yours,

Joseph S. Kowalczyk, P.E.
37 Winnisimmet Street
Unit 3L - Owner & Resident
Chelsea, MA 02150

cc: Honorable Thomas F. Birmingham, Senate President
Preston G. Galarneau,Jr. , District 8 Chelsea City Councilor
Jeffery Buck, President Chelsea Waterfront Association
Meridian Wharf Condominium Association

Letter 204
Joseph S. Kowalczyk
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
204.1	Ground Transportation	Access to Logan	...The volume of additional traffic generated by the airport expansion should be specifically quantified and impacts on local traffic patterns should account for the fact that Chelsea bears the burden of the economic and time saving most commercial operations use in determining routing.	The Airside Project does not result in additional demand for ground access services. Refer to the *Logan Airport 1994/95 GEIR* which includes Massport's Ground Access Management Plan, targeted HOV shares, forecasted Vehicle Miles Traveled, and trips by mode for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis. The *Logan Airport 1999 Environmental Planning and Status Report* (previously GEIR) provides a status report on Massport's ground access initiatives and HOV ridership for 1999.
204.2	Noise	Mitigation	Tangible mitigation of noise must be included in the EIR which specifically addresses the impact to our community.	To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, but also (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the *Logan Airport 1999 ESPR.* For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement sound insulation improvements.
204.3	Alternatives	Runway 14/32	Chelsea has no other option than to lobby EOEA to make the mitigation proposals an integral part of the project approval itself.... If we are to suffer for the greater Boston Regional common good then let us be compensated for our burdens here and now with the approval process for [Runway] 14/32.	Massport's mitigation measures are reinforced through compliance with M.G.L. Chapter 30A, Section 61 and through specific state and federal certificates approving projects that have mitigation. The status of the Section 61 Finding commitments are tracked and reported in the *Logan Airport 1999 ESPR* (previously GEIR). See also the Proposed Section 61 Findings in Section 8.7 of the Supplemental DEIS/FEIR.

February 28, 1999

LETTER 205

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street - Room 2000
Boston, MA 02202

RE: **Runway 14/32 Expansion Plans**

Dear Mr. Secretary:

As a Resident and Home Owner in Chelsea, my specific request is for your office to consider the overwhelming environmental burden borne by the City of Chelsea. I am requesting that the following be addressed prior to any expansion plan is supported:

- Local Traffic Patterns - The volume of additional traffic generated by the airport expansion should be specifically quantified and impacts on local traffic patterns should account for the fact that Chelsea bears the burden of the economic and time savings most commercial operators use in determining routing. **Considerations for accelerating the construction of the Haul Road around Chelsea must be accelerated.** 205.1

- Noise - Tangible mitigation of noise must be included in the EIR which specifically addresses the impact to our community. **Recommendations for noise attenuation such as sound proofing windows are necessary even without the expansion.** 205.2

- Alternative Airports - Boston's infrastructure can no longer bear the burden of Logan's expansion demands. Alternative studies completed by Massport have erroneously written off Hanscom, Providence, Worcester, and Manchester Airports to support business and area growth by distributing the environmental burdens. **An "independent committee" must be assigned to develop their own opinion of Massport's 14/32 expansion using professionals and experts others than those now "coaching" Massports "findings".** 205.3

Please know that I support economic growth for Boston, the Commonwealth, and new England but not at my Community's expense. Stop the runway, investigate alternate airport expansions and support equitable sharing of the environmental burdens among the Commonwealth.

Thank you again for your time and understanding of our matters.

Very truly yours,

Joseph S. Kowalczyk, P.E.
37 Winnisimmet Street
Unit 3L - Owner & Resident
Chelsea, MA 02150

Letter 205
Joseph S. Kowalczyk
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
205.1	Ground Transportation	Access to Logan	...The volume of additional traffic generated by the airport expansion should be specifically quantified and impacts on local traffic patterns should account for the fact that Chelsea bears the burden of the economic and time savings most commercial operators use in determining routing.	The Airside Project does not result in additional demand for ground access services. Refer to the *Logan Airport 1994/95 GEIR* which includes Massport's Ground Access Management Plan, targeted HOV shares, forecasted Vehicle Miles Traveled, and trips by mode for the 37.5 million and 45 million passenger levels that were studied in the Airside Project analysis. The *Logan Airport 1999 Environmental Planning and Status Report* (previously GEIR) provides a status report on Massport's ground access initiatives and HOV ridership for 1999.
205.2	Noise	Mitigation	Tangible mitigation of noise must be included in the EIR which specifically addresses the impact to our community. Recommendations for noise attenuation such as sound proofing windows are necessary even without the expansion.	To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, and also (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the *Logan Airport 1999 ESPR*. For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement sound insulation improvements.

Code	Topic 1	Topic 2	Comment	Response
205.3	Regional Transportation	Regional Airports	Alternative Airports – Boston's infrastructure can no longer bear the burden of Logan's expansion demands. Alternation studies completed by Massport have erroneously written off Hanscom, Providence, Worcester, and Manchester Airports to support business and area growth by distributing the environmental burdens. An "independent committee" must be assigned to developed their own opinion of Massport's 14/32 expansion using professionals and experts other than those now "coaching" Massport's "findings".	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts. Over the last ten years, various agencies and transportation planning organizations have conducted a number of studies that address regional transportation issues. These studies have concluded that The Airside Project at Logan Airport, the expansion of the regional airports, and the implementation of high-speed rail are all necessary for meeting the short-term and long-term inter-city travel needs of the New England region. These regional recommendations are in various stages of implementation. Refer to Chapter 2 of the Supplemental DEIS/FEIR for a complete discussion of regional transportation alternatives to Logan Airport and steps Massport has taken to foster increased use of these alternatives. Massport has a history of engaging in cooperative regional transportation planning and continues its efforts to promote an efficient and balanced regional transportation system. Massport's most recent endeavors include its co-sponsorship of the Regional Transportation Summit of New England Governors in November 1999, attendance at a second summit in December 2000, and its assumption of operating responsibility for the Worcester Regional Airport in January 2000. Refer to Section 2.9 of the Supplemental DEIS/FEIR for a discussion of Massport's initiatives in support regional transportation alternatives.

100 CAPTAIN'S ROW CONDOMINIUM TRUST
c/o Lundgren Management Group, Inc.
121 Captain's Row
Chelsea, MA 02150

LETTER 206

April 22, 1999

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

Re: Logan Airside Improvements Planning Project, Boston, MA
EOEA #10458

Dear Secretary Durand:

As a trustee of the 100 Captain's Row Condominium Trust of Admiral's Hill in Chelsea I am writing to voice the association's opposition to Massport's "Logan Airside Improvement Planning Project."

The Draft EIR/S contains many discrepancies and inadequacies and fails to address our concerns regarding the health impacts of a new runway on our neighborhoods. For the reasons detailed below, and we are sure many more, we encourage you to find this document inadequate and respectfully request the FAA withdraw support for the project. 206.1

It has come to our attention that the new runway will allow for a tripling of flights over Chelsea. Enough is enough! Our health is currently jeopardized by hundreds of thousands of vehicles travelling over the Tobin Bridge on one side, airplanes arriving and departing over head, a salt pile on another side, oil tank and asphalt facilities on our shores. and an onslaught of heavy truck traffic associated with all of them. We can not accept another assault on the quality of life in our neighborhood. 206.2

First and foremost, the method used to measure the noise impact is inaccurate. We have learned through numerous conversations with Massport and the FAA that the yearly average noise level "predicted" by the integrated noise model has consistently underestimated the actual noise levels affecting Chelsea. The real data, obtained by a permanent noise monitor located on Admiral's Hill, indicates we should be eligible for soundproofing based on current noise levels! The use of the same model to predict the impact of the dramatic increase in flights over our heads will surely the noise impacts on our area. We also feel that soundproofing does little to mitigate the noise impact. Sound insulation does not protect our children when they are playing in the park, does not help 206.3

us as we try to enjoy a sea breeze through open windows in the summertime and does not prevent us from interrupting conversation as we enjoy our pool area.

We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue. Chelsea is a City of immigrants – always has been and always will be. We believe it is not coincidence that we have been targeted with the brunt of the noise impact of the proposal. But what about the other impacts on the low income, minority residents of Chelsea? Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on us. In this sense the document also seems woefully inadequate. 206.4

Naturally we were upset to learn that other alternatives such as a thorough regionalization plan including ALL other options was not included. Additionally, we believe a peak-hour pricing plan analyzing the delay effects of 80, 90, and 100 operations per hour should have been considered because 115 operations per hour understates the true benefit of this alternative. Why wasn't a second airport examined? 206.5

While Massport refuses to admit the Airside Improvement Planning Project will expand capacity at Logan, Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations. Nothing has been done to determine the traffic impacts associated with expected increases in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea. 206.6

Chelsea is undergoing a modern day renaissance. We have had to fight harder than most to turn the City around. As this proposal is being examined we are watching the value of our homes rise. We have a new school system and a local government committed to undoing the past. We were recently honored as an "All America City," in recognition for our ability to address the problems confronting us. Our budget is balanced for the first time, and we are investing millions in our infrastructure in order to move forward into the next century. The proposed expansion of Logan Airport is the single largest threat we face. If this runway is built, years of hard work could be undone in an instant.

Sincerely,

Karen Brown
Trustee, ____________

CC: Mr. John Silva, FAA
Mr. John DeVillars, EPA

LEEWARD HEIGHTS CONDOMINIUM TRUST
c/o Lundgren Management Group, Inc.
121 Captain's Row
Chelsea, MA 02150

April 22, 1999

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

Re: Logan Airside Improvements Planning Project, Boston, MA
EOEA #10458

Dear Secretary Durand:

As a trustee of the Leeward Heights Condominium Trust of Admiral's Hill in Chelsea I am writing to voice the association's opposition to Massport's "Logan Airside Improvement Planning Project."

The Draft EIR/S contains many discrepancies and inadequacies and fails to address our concerns regarding the health impacts of a new runway on our neighborhoods. For the reasons detailed below, and we are sure many more, we encourage you to find this document inadequate and respectfully request the FAA withdraw support for the project.

It has come to our attention that the new runway will allow for a tripling of flights over Chelsea. Enough is enough! Our health is currently jeopardized by hundreds of thousands of vehicles travelling over the Tobin Bridge on one side, airplanes arriving and departing over head, a salt pile on another side, oil tank and asphalt facilities on our shores, and an onslaught of heavy truck traffic associated with all of them. We can not accept another assault on the quality of life in our neighborhood.

First and foremost, the method used to measure the noise impact is inaccurate. We have learned through numerous conversations with Massport and the FAA that the yearly average noise level "predicted" by the integrated noise model has consistently underestimated the actual noise levels affecting Chelsea. The real data, obtained by a permanent noise monitor located on Admiral's Hill, indicates we should be eligible for soundproofing based on current noise levels! The use of the same model to predict the impact of the dramatic increase in flights over our heads will surely the noise impacts on our area. We also feel that soundproofing does little to mitigate the noise impact. Sound insulation does not protect our children when they are playing in the park, does not help

us as we try to enjoy a sea breeze through open windows in the summertime and does not prevent us from interrupting conversation as we enjoy our pool area.

We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue. Chelsea is a City of immigrants – always has been and always will be. We believe it is not coincidence that we have been targeted with the brunt of the noise impact of the proposal. But what about the other impacts on the low income, minority residents of Chelsea? Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on us. In this sense the document also seems woefully inadequate.

Naturally we were upset to learn that other alternatives such as a thorough regionalization plan including ALL other options was not included. Additionally, we believe a peak-hour pricing plan analyzing the delay effects of 80, 90, and 100 operations per hour should have been considered because 115 operations per hour understates the true benefit of this alternative. Why wasn't a second airport examined?

While Massport refuses to admit the Airside Improvement Planning Project will expand capacity at Logan, Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations. Nothing has been done to determine the traffic impacts associated with expected increases in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.

Chelsea is undergoing a modern day renaissance. We have had to fight harder than most to turn the City around. As this proposal is being examined we are watching the value of our homes rise. We have a new school system and a local government committed to undoing the past. We were recently honored as an "All America City," in recognition for our ability to address the problems confronting us. Our budget is balanced for the first time, and we are investing millions in our infrastructure in order to move forward into the next century. The proposed expansion of Logan Airport is the single largest threat we face. If this runway is built, years of hard work could be undone in an instant.

Sincerely,

James Bradley
Trustee,

CC: Mr. John Silva, FAA
Mr. John DeVillars, EPA

CLIPPER CONDOMINIUM TRUST
c/o Lundgren Management Group, Inc.
121 Captain's Row
Chelsea, MA 02150

April 22, 1999

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

Re: Logan Airside Improvements Planning Project, Boston, MA
EOEA #10458

Dear Secretary Durand:

As a trustee of the Clipper Condominium Trust of Admiral's Hill in Chelsea I am writing to voice the association's opposition to Massport's "Logan Airside Improvement Planning Project."

The Draft EIR/S contains many discrepancies and inadequacies and fails to address our concerns regarding the health impacts of a new runway on our neighborhoods. For the reasons detailed below, and we are sure many more, we encourage you to find this document inadequate and respectfully request the FAA withdraw support for the project.

It has come to our attention that the new runway will allow for a tripling of flights over Chelsea. Enough is enough! Our health is currently jeopardized by hundreds of thousands of vehicles travelling over the Tobin Bridge on one side, airplanes arriving and departing over head, a salt pile on another side, oil tank and asphalt facilities on our shores, and an onslaught of heavy truck traffic associated with all of them. We can not accept another assault on the quality of life in our neighborhood.

First and foremost, the method used to measure the noise impact is inaccurate. We have learned through numerous conversations with Massport and the FAA that the yearly average noise level "predicted" by the integrated noise model has consistently underestimated the actual noise levels affecting Chelsea. The real data, obtained by a permanent noise monitor located on Admiral's Hill, indicates we should be eligible for soundproofing based on current noise levels! The use of the same model to predict the impact of the dramatic increase in flights over our heads will surely the noise impacts on our area. We also feel that soundproofing does little to mitigate the noise impact. Sound insulation does not protect our children when they are playing in the park, does not help

us as we try to enjoy a sea breeze through open windows in the summertime and does not prevent us from interrupting conversation as we enjoy our pool area.

We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue. Chelsea is a City of immigrants – always has been and always will be. We believe it is not coincidence that we have been targeted with the brunt of the noise impact of the proposal. But what about the other impacts on the low income, minority residents of Chelsea? Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on us. In this sense the document also seems woefully inadequate.

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While Massport refuses to admit the Airside Improvement Planning Project will expand capacity at Logan, Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations. Nothing has been done to determine the traffic impacts associated with expected increases in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.

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Sincerely,

Jack Fraser
Trustee,

CC: Mr. John Silva, FAA
Mr. John DeVillars, EPA

ADMIRAL'S WAY CONDOMINIUM TRUST
c/o Lundgren Management Group, Inc.
121 Captain's Row
Chelsea, MA 02150

April 22, 1999

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

Re: Logan Airside Improvements Planning Project, Boston, MA
EOEA #10458

Dear Secretary Durand:

As a trustee of the Admiral's Way Condominium Trust of Admiral's Hill in Chelsea I am writing to voice the association's opposition to Massport's "Logan Airside Improvement Planning Project."

The Draft EIR/S contains many discrepancies and inadequacies and fails to address our concerns regarding the health impacts of a new runway on our neighborhoods. For the reasons detailed below, and we are sure many more, we encourage you to find this document inadequate and respectfully request the FAA withdraw support for the project.

It has come to our attention that the new runway will allow for a tripling of flights over Chelsea. ,Enough is enough! Our health is currently jeopardized by hundreds of thousands of vehicles travelling over the Tobin Bridge on one side, airplanes arriving and departing over head, a salt pile on another side, oil tank and asphalt facilities on our shores, and an onslaught of heavy truck traffic associated with all of them. We can not accept another assault on the quality of life in our neighborhood.

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us as we try to enjoy a sea breeze through open windows in the summertime and does not prevent us from interrupting conversation as we enjoy our pool area.

We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue. Chelsea is a City of immigrants – always has been and always will be. We believe it is not coincidence that we have been targeted with the brunt of the noise impact of the proposal. But what about the other impacts on the low income, minority residents of Chelsea? Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on us. In this sense the document also seems woefully inadequate.

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While Massport refuses to admit the Airside Improvement Planning Project will expand capacity at Logan, Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations. Nothing has been done to determine the traffic impacts associated with expected increases in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.

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Sincerely,

John Marsh
Trustee,

CC: Mr. John Silva, FAA
Mr. John DeVillars, EPA

BREAKWATER CONDOMINIUM TRUST
c/o Lundgren Management Group, Inc.
121 Captain's Row
Chelsea, MA 02150

April 22, 1999

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

Re: Logan Airside Improvements Planning Project, Boston, MA
EOEA #10458

Dear Secretary Durand:

As a trustee of the Breakwater Condominium Trust of Admiral's Hill in Chelsea I am writing to voice the association's opposition to Massport's "Logan Airside Improvement Planning Project."

The Draft EIR/S contains many discrepancies and inadequacies and fails to address our concerns regarding the health impacts of a new runway on our neighborhoods. For the reasons detailed below, and we are sure many more, we encourage you to find this document inadequate and respectfully request the FAA withdraw support for the project.

It has come to our attention that the new runway will allow for a tripling of flights over Chelsea. Enough is enough! Our health is currently jeopardized by hundreds of thousands of vehicles travelling over the Tobin Bridge on one side, airplanes arriving and departing over head, a salt pile on another side, oil tank and asphalt facilities on our shores, and an onslaught of heavy truck traffic associated with all of them. We can not accept another assault on the quality of life in our neighborhood.

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We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue. Chelsea is a City of immigrants – always has been and always will be. We believe it is not coincidence that we have been targeted with the brunt of the noise impact of the proposal. But what about the other impacts on the low income, minority residents of Chelsea? Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on us. In this sense the document also seems woefully inadequate.

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While Massport refuses to admit the Airside Improvement Planning Project will expand capacity at Logan, Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations. Nothing has been done to determine the traffic impacts associated with expected increases in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.

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Sincerely,

Richard Trauth
Trustee, ____________________

CC: Mr. John Silva, FAA
Mr. John DeVillars, EPA

100 COMMANDANT'S WAY CONDOMINIUM TRUST
c/o Lundgren Management Group, Inc.
121 Captain's Row
Chelsea, MA 02150

April 22, 1999

Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

Re: Logan Airside Improvements Planning Project, Boston, MA
EOEA #10458

Dear Secretary Durand:

As a trustee of the 100 Commandant's Way Condominium Trust of Admiral's Hill in Chelsea I am writing to voice the association's opposition to Massport's "Logan Airside Improvement Planning Project."

The Draft EIR/S contains many discrepancies and inadequacies and fails to address our concerns regarding the health impacts of a new runway on our neighborhoods. For the reasons detailed below, and we are sure many more, we encourage you to find this document inadequate and respectfully request the FAA withdraw support for the project.

It has come to our attention that the new runway will allow for a tripling of flights over Chelsea. Enough is enough! Our health is currently jeopardized by hundreds of thousands of vehicles travelling over the Tobin Bridge on one side, airplanes arriving and departing over head, a salt pile on another side, oil tank and asphalt facilities on our shores, and an onslaught of heavy truck traffic associated with all of them. We can not accept another assault on the quality of life in our neighborhood.

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We are also disturbed about the DEIR/S' lack of consideration of the Environmental Justice issue. Chelsea is a City of immigrants – always has been and always will be. We believe it is not coincidence that we have been targeted with the brunt of the noise impact of the proposal. But what about the other impacts on the low income, minority residents of Chelsea? Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on us. In this sense the document also seems woefully inadequate.

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While Massport refuses to admit the Airside Improvement Planning Project will expand capacity at Logan, Federal planning policy establishes that this project must be considered and evaluated as stimulating growth in aircraft operations. Nothing has been done to determine the traffic impacts associated with expected increases in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.

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Sincerely,

Sheila Cherkas
Trustee, Sheila Cherkas

CC: Mr. John Silva, FAA
Mr. John DeVillars, EPA

Letter 206

Lundgren Management Group, Inc.

Private Citizens: Chelsea

100 Captain's Row Condominium Trust – Karen Brown, Trustee,
Leeward Heights Condominium Trust – James Bradley, Trustee,
Row Condominium Trust – Karen Brown, Trustee,
Clipper Condominium Trust – Jack Fraser, Trustee,
Admiral's Way Condominium Trust – John Marsh, Trustee,
Breakwater Condominium Trust – Richard Trauth, Trustee,
100 Commandant's Way Condominium Trust – Sheila Cherkas, Trustee

Code	Topic 1	Topic 2	Comment	Response
206.1	Environmental Review Process	MEPA	....we encourage you to find this document inadequate and respectively request the FAA withdraw support for the project.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.
206.2	Public Health	Effects	[The proposed project would have adverse cumulative impacts on Chelsea.]	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-8 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
206.3	Noise	Model	...the method used to measure the noise impact is inaccurate. We have learned through numerous conversations with Massport and the FAA that the yearly average noise level "predicted" by the integrated noise model has consistently underestimated the actual noise levels affecting Chelsea. The real data, obtained by a permanent noise monitor located on Admiral's Hill, indicates we should be eligible for soundproofing based on current noise levels!	Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix E of the *Logan Airport 1996 Annual Update).* In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft -- a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the *Logan Airport 1999 ESPR* (previously GEIR)). Massport continues to investigate possible causes for remaining differences (such as from hill effects) and continues to pursue FAA approval of noise model adjustments that would permit expansion of its sound insulation program to include the effects of terrain. Massport also expects to extend eligibility lines to include boundaries that follow local streets rather than strict noise contour lines. Nevertheless, Massport continues to believe that the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure. To the extent that federal regulations permit and that funding is available, the proposed sound insulation program will include: (i) not only all residences that fall within the Preferred Alternative's 65 dB Day-Night Sound Level contour when compared to the Airside Project's No Action Alternative's 65 dB Day-Night Sound Level contour, but also (ii) Massport and the FAA will continue to sound insulate and work to complete the current 2-year sound insulation program as presented in the *Logan Airport 1999 ESPR.* For the eligible residences, the FAA will fund building code upgrades, to the extent necessary, to implement sound insulation improvements.
206.4	Environmental Justice	Impacts	Nothing was done in this report to address the Environmental Justice issue regarding the negative health impacts on [Chelsea].	The environmental justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. Environmental and health studies relating to the City of Chelsea were reviewed to assess the potential for other cumulative or multiple adverse exposures, since the increase in population within the 65 dB DNL contour associated with the Preferred Alternative is primarily within this community. A review of issues within Chelsea indicated a concern regarding toxic discharges from industrial facilities, truck emissions, and contamination of Chelsea Creek. While it is true that sound insulation does not alleviate noise exposure outside, it is an effective technique that has been implemented effectively, not only at Logan Airport, but also at numerous other airports throughout the United States.

Code	Topic 1	Topic 2	Comment	Response
206.5	Alternatives	Peak Period Pricing	...we believe a peak-hour pricing plan analyzing the delay effects of 80, 90, and 100 operations per hour should have been considered because 115 operations per hour understates the true benefit of this alternative. Why wasn't a second airport examined?	The Airside Project analysis of PPP examined an operations threshold of 110 operations per hour, which is already below Logan Airport's normal operating capacity of 120 operations per hour. There is no legitimate operational justification for imposing a peak period surcharge at an operation level significantly lower than Logan Airport's normal operating capacity which is achieved 80 percent of the year without any delays. Even at 75 operations per hour, Logan Airport would be subject to delays from northwest wind conditions. The Airside Project analysis in the Airside Project Draft EIS/EIR and in the Supplemental DEIS/FEIR indicates that, with the Preferred Alternative, Logan Airport can accommodate existing and foreseeable future levels of demand without imposing a drastic administrative restriction to artificially revise Logan Airport's existing capacity. Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Hanscom Field's potential service area overlaps with the service areas for several airports that already have the necessary infrastructure for commercial service. These airports are the Hanscom Field, T.F. Green/Providence, and Worcester Regional, all which have had or are undergoing major improvements to their terminal buildings, other landside facilities and airfields.
206.6	Public Health	Effects	Nothing has been done to determine the traffic impacts associated with expected increase in operations associated with this proposal. Chelsea can expect nothing but a dramatic increase in airport related heavy truck activity. The effect of these trucks on health is well documented by the EPA, yet the Draft EIR/S does not address the negative impacts of more truck traffic and congestion on Chelsea.	Cargo activity, which is associated with truck traffic, is not expected to increase as a result of any of the alternatives.

LETTER 207

April 22, 1999

Secretary of Environmental Affairs: MEPA Office
Mr. Arthur Pugsley
100 Cambridge Street
2oth Floor
Boston, MA 02202

Re: EOEA No. 10458: Massport Runway 14/32 Proposal

Dear Mr. Pugsley,

Attached are my comments on Massport's Joint EIS/EIR on Runway 14/32, with appendices. I appreciate the environmental agencies' careful consideration of the public and community comments on this proposal. After careful review, I urge either the withdrawal of the plan or its rejection as a proposal that is inconsistent with the requirements of the National Environmental Policy Act, and unresponsive to the scoping directives of the secretaries and to the concerns of the public. 207.1

Sincerely,
E McGrath
Elaine McGrath
40 Beacon St.
Chelsea, MA 02150

Enc: Comments, w/7 Appendices

INTRODUCTION

Massport's Draft EIS/EIR on its 14/32 proposal is inconsistent with the letter and the spirit of the National Environmental Policy Act(NEPA).Furthermore, it has failed to respond to specific scoping directives in the Letters and Certificate issued by EPA, MEPA and DEP in 1995. 207.2

NEPA requires agencies to take a hard look at the environmental consequences of their proposals, and to conduct a detailed and thorough anaylsis of alternatives and to make this information available to the public. Massport has not done this. There are fatal flaws with its analyses of impacts, alternatives and environmental justice. The result is that this proposal gives the wrong impression of the human, environmental impacts of its current and proposed operations. The ground and air impacts of its operations are not extrememly limited or tolerable and Massport's mitigation is not as effective as they claim. The analysis systematically understates the noisy, unhealthful, dirty, dangerous and ugly aspects of Logan. 207.3

The proposal specifically fails to respond to directives intended to uncover these impacts, in the scoping letters of Secretaries Coxe and DeVillars, as well as DEP. Among Secretary Coxe's directives were: the need for the Draft EIS/EIR to be sensitive to the issue of environmental justice; detailed analysis of noise impacts; the need to address the effectiveness of alternative methods of achieving PRAS goals which do not rely on airfield improvements; the need for elaboration of the big picture issues regarding mitigation (Vol. II, C1-35). Secretary DeVillars emphasized the tremendous impact on communities and the region in terms of air quality, traffic and noise from Logan; the significant increases in cargo operations, with instructions 207.4

to assess the impact on Chelsea, and, in a related matter, asked Massport to evaluate major roadway intersections for air quality violations. The EPA also recommended that Massport fully disclose impacts to the communities and address mitigation options including restrictions on operations. (Vol. II, Letter 1). DEP emphasized parking issues in Chelsea (Vol. II, Letter 2.3). Massport omits many of these issues from its analysis, or simply evades the inquiry (see Vol. II. 1-12,2-3 Responses).

Regarding the analysis contained in the proposal, there are at least 3 critical flaws: systematic understatement of impacts, and related to this, failure to do a meaningful alternatives analysis or a sensitive environmental justice analysis.

IMPACTS ANALYSIS

Massport's impacts analysis understates impacts in a number of ways that have the cumulative effect of systematically minimizing Logan's impacts on the surrounding communities:

- failure to account for the context and intensity of growth in airport operations, both land and air
- unreliable modeling of impacts
- inadequate and inaccurate monitoring of impacts and of mitigation
- failure to report or take into account community feedback
- persistent use of data known to be flawed, and unwillingness to correct mistakes
- systematic and knowing selection of data so as to minimize the appearance of impacts.

207.5

The impacts analysis is essential to understand how a proposal will affect the environment and the people who live with the impacts. The context and intensity of the impacts are a first, crucial part of this analysis. Anyone unfamiliar with the communities surrounding the airport would be severely challenged to extract the big picture from this proposal, where information on the communities is buried in repeated PR for Massport's preferred alternative. Where is the accounting for the environmental damage in places like Chelsea, East Boston, Revere and Winthrop: the hundreds of thousands of passenger and cargo vehicles every day, the community disruption of hours of low-level landings and take-offs every day, every weekend, all day, and all night? To read this proposal is to wonder why Winchendon and Bedford and Concord were so upset at the prospect of an airport, since Massport asserts that overall, things aren't so bad and they're getting better, because of Stage 3 aircraft.

In the first place, as a matter of common sense, Massport's assertion that noise exposure from current flyovers is less and will be less than it was in the peak, baseline year of 1993, is symptomatic of the problem with Massport's credibility and the quality of its analysis. In 1993, there were 493,000 operations; in 1998, 507,000 (Vol. I, 1-9). Despite the increased number of operations, Massport claims that the noise exposure is less because of increased use of quieter Stage 3 aircraft (Vol. I, 6-9 amd passim). However, what they fail to highlight, but what their 1994/1995 GEIR states explicitly, is that Stage 3 aircraft are not appreciably quieter on landing and take-off, the noisiest operations which are the ones that affect the surrounding communities. Contrary to Massport's disingenuous assertions, Stage 3 aircraft do not and cannot reduce the noise exposure of the surrounding communities, which are bludgeoned with the noise of take-offs and landings; Massport actually admits this, in a buried paragraph in its noise analysis, which otherwise invokes the Stage 3 mantra (Vol. I, 5-24). For operations to increase by 14,000 will increase, not decrease noise exposure. 207.6

Another common sense problem with Massport's impacts analysis is its claim that routing 14/32 flights over the water will provide relief. Massport states, in a meaningful but too subtle way, that when 14/32 flights go over land, as they have to inevitably, they will over fly over communities now affected (Vol. I, 6-10). This means more impacts on already strained communities, not less.

Another basic source of understatement is more indirect: the use of outdated PRAS goals to justify impacts as "community-approved". This is misleading in the extreme. PRAS goals are repeatedly invoked as a justification for increasing impacts to certain neighborhoods, such as Chelsea, in an 207.7

attempt to achieve a "rough justice" of pain, by moving the problem of impacts around. However, these goals were developed in 1982-83 (Vol. I, 5-17,5-20), when airport land and air operations were a fraction of what they are now. Furthermore, it is inappropriate to call them "community-approved" in the face of community criticism of the way they were set and are used by Massport. In 1982, the number of operations was 275,000; in 1998, it was 507,000 (Vol. I, 1-9) In 1982, Massport handled 503,000,000 lbs of air cargo (think 18-wheeler trucks in your neighborhood!); in 1998, there were 970 MM (Vol. I, 1-9). PRAS goals also exclude non-jet operations (Vol. I, 5-18), and thereby do not account for all operations. In addition, the PRAS system has no ability to adjust automatically to changes in demand; whatever changes were made in 1996's "enhanced PRAS" to deal with this skewing is unclear from this proposal (Vol. I, 5-20,5-21).

Whatever choice community residents were given in the early 1980's regarding operational goals at Logan, the use of outdated PRAS goals when operations have risen 112% from 1977-1997 (Vol. I, 1-9), is not appropriate. It is a different orderof magnitude to absorb 30 or 40% of 275,000 vs. 507,000 operations. It is disingenuous of Massport to invoke such outmoded "community" goals in the face of the current volume of its operations, and the long-standing protests from communities that they can't take any more (see Vol. II, Letter 10). The communities have been clear that current operations impose unacceptable and destructive air and noise pollution on residents. The PRAS goals are not the community goals; the community goals are relief, "sufficient relief" (a Massport concept) from the nuisance of airport ground and air operations, the right to quiet enjoyment of their homes,which is guaranteed by law, and livable communities. Those are the community goals.

Any model is only an estimate. In addition to the above problems with inputs to its model, Massport's INM noise modelling has fallen short of actual impacts in several instances. (See, e.g., failure to follow ROD Runway 27 allocation, which undersated 65 dB DNL contours; Chelsea City Councillor Galarneau's Beacon St. monitor test at 70 DNL in 1998; Vol. I, 5-24). The INM, state-of-the-art computer-generated noise contour map (Vol. I, 5-3,5-12, 5-15) stands in the face of experience to the contrary, and the deficiencies of Massport's modelling are only aggravated by its inadequate and amateurish monitoring. 207.8

In Chelsea, for example, the noise contour map asserts that no one currently, or for many years, has fallen within the 65dB cutoff (App. 1). The city itself has protested this as untrue (Vol. II, Letter 16). The numbers of people in Chelsea who are routinely subject to 65dB airplane noise are well above Massport's estimates, in several spots: the waterfront east of the Tobin Bridge, Admiral's Hill, Bellingham Square and the peak streets on the hills. Massport's modelling doesn't reflect this. Its monitoring either doesn't monitor thsese spots at all or else understates impacts by allowing monitors to do down without repairing them for up to 2 years (App. 2).

When and where monitoring has been done in Chelsea, readings are routinely in the 90-100 dB range (see App. 3), and meet the 70 dNL standard for average noise (based on readings at Monitor 15 at Admiral's Hill, and readings from temporary monitor on Beacon St. in 1998). However, actual noise impacts are not adequately or consistently monitored at some hot spots, again depressing the impact numbers. For 2 years, Massport's noise monitor on Admiral's Hill in Chelsea was down, including the entire baseline year of 1993 (see App. 2). The same problem occurred for 2 weeks during the short period in 1998 when Councillor Galarneau had a temporary monitor on Beacon St.

Furthermore, noise impacts are also understated because monitors are not placed to capture the full impacts of Massport's noise and air pollution (see Vol. II, 31-45). Chelsea, for example, has only 1 noise monitor, on Admiral's Hill, and 1 air monitoring station, at the Soldier's Home on Powderhorn Hill. These hills are 2 of the high points in the city, each removed from the most severe impacts of Massport's operations. As planes take off or land, they pass over the waterfront at altitudes well below 300 feet and drop, or rise as they approach Admiral's Hill. The impacts recorded on the hill are less than what the waterfront residents experience, for this reason. The 18-wheeler blitzkrieg occurs outside the gated, truck-exclusion Admiral's Hill area, again on the waterfront. The air and noise pollution from hundreds of 18-wheelers on their way to the airport via the Beacon Street off-ramp, travelling through densely-populated 50-ft. streets every day, plus the millions of passenger vehicles to the airport every year, all travel through the waterfront area. This area is at the other end of Chelsea from the Powderhorn Hill monitor. The waterfront hot spot is simply not monitored; and Massport is allowed to claim that no monitoring means no impacts.

If you fail to maintain monitors in working condition for as long as 2 years, if you manipulate calculated vs. measured LDN values in your presentation of data (compare App. 2 with Vol. I, Table 5.2.4), and if you do not monitor noise hot spots, then your statistics are all skewed so as to minimize the true extent of impacts.

To arrive at its numbers, Massport has also disregarded another source of information that is a reality check on its modelling and monitoring: public feedback. In Chelsea, and in other affected communities, residents have complained for years that impacts have been unbearable. One flight path tracks the street where I live in Chelsea: Beacon Street. Planes fly almost daily, and routinely on Saturdays and Sundays starting at 6 a.m., for hours (14.5 this summer was a record), often past midnight, and throughout the night. They fly at intervals of 60 seconds or less very often, and this is for hours. On the Chelsea waterfront, planes fly right above the roofs of 3-story 45-ft brick rowhouses. A Massport official at the Chelsea City Council meeting of March 3, 1999, stated that planes coming in for a landing over the waterfront (on 15R/33L) are at approximately 268 feet. They are closer than that to the roofs. The screaming, booming, thundering jet noises are painful and profoundly disruptive to normal life. It is impossible to hear someone speaking to you from 3 feet away. You cannot hear conversation, TV, music or yourself think; this is indoors. It is difficult to fall asleep or stay asleep. Brick houses vibrate. Bones vibrate. All the health effects of extreme noise exposure, and the consequences of constant triggering of the "flight or fight" response define the quality of life in the areas around the airport. Chelsea's waterfront is one of the oldest parts of the city, settled in the 1600's. Many of the rowhouses were built in the 1800's; the house where I live was built in 1865. These buildings were not designed to withstand the repeated impacts of jumbo jets flying overhead at less than 300 feet. The EPA goal of a DNL of 45 dB inside a home (Vol. I, 6-57) would be a welcome relief on the waterfront; of course, Massport chooses to use the significantly higher FAA standard of 65.

Massport officials know that more people in Chelsea are subject to much more noise than their modelling captures in the noise contour, or their 1 monitor shows. Massport representatives, including Peter Blute and Betty Desrosiers, have conceded this as a matter of public record in Chelsea City Council meetings and at the presentation at the Chelsea YMCA on 1/19/99. But Massport has not let information get in the way of their analysis.

The failures of Logan's modelling and monitoring have been raised for years by many communities. They are known to Massport and the FAA, who do not reflect them in this proposal and did not respond to them in the "Responses" to Comments (see, e.g., Vol. II, 10.9, 13, 14.12, 16.6, 31.47, and Vol.1, 6.5). The agencies have in fact denied any community disruption (Vol. I, 6-5). Massport does not include in its proposal the persistent community protests, the noise complaint data from its hotline, or present in a coherent way its own track record of inaccurate noise measurement. Even protests from local, state and federal representatives are not used as a check for the numbers that Massport wants to use (see, e.g., Vol. II, passim). 207.9

Massport's modelling and monitoring fail to capture reality. Massport knows this. The communities have presented evidence for years that agreed-upon flight paths are not followed, that noise impacts are far worse than the imaginary noise contour maps suggest (it's not unusual for the map to draw the contour line in a place like the middle of Chelsea Creek), and that monitoring stations do not fully capture the real impacts of flyovers because of their inadequate placement and maintenance. As community residents consistently testified at the April 7 and 8 public hearings, they are much more disturbed than Massport will admit.

Despite the protests, none of the communities' pleas have persuaded Massport to revise its noise contour map, until it was useful to do so as part of this proposal. In Chelsea, despite what Massport has conceded to be understatement of impacts, currently and for many years, no one in Chelsea fell within the 65 dB noise contour. Furthermore, the waterfront area, including Beacon Street, is not on the map under the 14/32 proposal (Vol. I, 5-3). This is so, even though Massport uses numbers of several thousands of people in Chelsea in the 65dB, up to the 75dB range, in its hypothetical 1993 baseline for the city. 207.10

Because of the way that Massport conducts its community relations, even complaints are low, although they do provide another useful check on Massport's numbers. The unwillingness of Massport to honestly report on impacts extends to the operation of the Noise Complaint Hotline. Community feedback has highlighted the many problems with this hotline: inadequate staffing (from 9-5 weekdays, there is a dedicated number; nights, weekeends and holidays, you are transferred to operations), the line is frequently busy or out of commission (especially during blitzkriegs), often hostile staff who argue with you or fail to take information correctly. My own experience is that it is a discouraging experience to even register a complaint, and that Massport makes it difficult. Often, details about the duration, frequency or height of flyovers is omitted through careless or intentional editing of complaints. Of course, this is important information that could be used as a check on impact numbers. Instead, people often experience the complaint hotline as "insult added to injury" and stop registering their complaints. With such hostility and frequent unavailability of the line, the extent of neighborhood disturbance is again understated. It is worthwhile to remember that, as a rule of thumb, where

1 person has the gumption to complain about a disturbance, at least 10 others have been disturbed but have not complained. (See, for illustrative purposes, App. 4).

There are still more sources of bad statistics and understatement. One is the omission of significant data through failure to coordinate with other agencies with necessaryexpertise, such as the Department of Public Health, the State Transportation 207.11
Department, including public transportation gurus and highway departments, or through failure to report available information. For example, in disregard of EPA and DEP directives (Vol. II, Letters 1, 1.12,1.15,2.+3), Massport doesn't take into specific account the noise and air pollution caused by through drivers to Logan: 18-wheeler, Logan Equipment, passengers, parking lots. Cargo traffic grew from a 1991 low of 498,000,000 lbs to a high of 974 million lbs in 1997 (Vol. I, 1-9). This moves at night primarily, on cargo planes that fly between 10 p.m. and 6 a.m. They rumble like air cargo planes do, when they fly over at 4 a.m. (Vol. I, 1-10). Down at the ground, what this means is that the Chelsea and East Boston waterfronts, and parts of Charlestown, the North End,etc. have become truck routes for thousands of 18-wheeler long haul drivers, that run all day and nightthrough densely-populated residential neighborhoods. These are diesel trucks. The air and noise pollution from this operation, which Massport actively encourages, is not monitored. Readings by Massport/Tobin Bridge of truck noise on the Beacon Street ramp registered upwards of 100 dB, less than 30 feet from residences. The 1 air monitor in Chelsea from DPH is at Soldier's Home, as far away as you can get from the air and ground traffic to the airport. There's a concentrated impact area. It's 207.12
not monitored. These impacts are not accounted for in the proposal, and they will only get worse if Logan's oper-

ations are allowed to increase. Of course, Stage 3 aircraft won't help with this. In addition to the trucks and drive-through flyers, towns become parking lots. 2500+ parking spaces for employees and passengers, 2 car rental lots, and an Official Airport Overlay District designation is a lot of presence. It should be monitored independently, perhaps with funding from Massport to DPH to do an epidemiology study (see Vol. II, Letter 45.8& work with DPH instead of passing the buck (Vol. II, 45.8). DPH is underresourced, the environmental agencies are strained financially. Residents have requested additional monitors (Vol. II, Letters 17.5 and 45. 8), and an epidemiology study. Massport, which has spent $3 million on PR and consultants, as well as budgeting $200,000 for an ad campaign, and which has contributed $100 million to the Big Dig, should be able to fund a DPH assessment of health impacts in the surrounding communities. 207.13

As it is, Massport has failed to provide information requested in the scoping directives, or to inform the public about the consequences of Massport's operations. (See Vol. II, Letters 1, 1.12,1.15,2.3). The public has been in the position of informing everyone else of the real impacts.

Another unknown but overstated factor: the effectiveness of Massport's mitigation efforts, and the final source of understated impacts in this analysis. Massport's numbers are also low because of its incorrect assumption that its mitigation is effective. The proposal only mentions 1 test of the adequacy of Massport's testing of mitigation effectivess (Vol. I, 5-10), apparently of soundproofing of single rooms, the most extreme soundproofing done, in 1984!

Residents who have undergone soundproofing have complained that it is ineffective against the planes, and that Massport has failed to honor its commitments to mitigate; one speaker on April 7, 1999 compared it to holding up a wet tea bag (Vol. II, Letters 14.12, 36). It's also unclear from the analysis, what percentage of the eligible population have even received it. (see Vol. I, 5-11-a total of 4602 units have been soundproofed without a breakdown of types of soundproofing or follow-ups on effectiveness, or # eligible.)

Massport does not reflect these complaints in its analysis of mitigation. The complaints mean that even where Massport has tried to mitigate its impacts, it hasn't been able to. Nor does Massport identify any measures to assess whether the soundproofing works (Vol. II, Letter 31.13). In Chelsea, double-pane windows are worthless against the noise of low-flying jets (and trucks). Earplugs don't always work. The most extreme measure offered by Massport is soundproofing of one room. It's important to realize that, even if effective, this would hold you hostage in your home. Only one room would be livable. Home life in 1 room, no community life, is not mitigation. It is not a reasonable solution to the problem of excessive plane noise to make people prisoners in their own houses. This is not the normal life through soundproofing that Massport asserts (Vol. I, ES-5, 5-10). 207.14

Because of all the elements that tend to produce understated impacts on the people who live around the airport, the agency has underestimated the number of people who live with 60dB, 70 dB, 80-past 100dB routinely; the air and noise pollution its total operations produce; the social, economic, health and esthetic damage it does. By not verifying its models, and failing to take into account information from residents, Massport has submitted an impacts analysis that is statistical nonsense. It is misinformation. 207.15

A second critical flaw in the proposal, and one affected by the faulty analysis of impacts, is Massport's failure to propose meaningful, reasonable alternatives and to conduct a thorough study and detailed description of them. This is in part a reflection of the bias in Massport's choice of "problem". Delay is as much a symptom of an airport operating beyond its effective capacity, as a problem per se. In fact, delay is only one of the problems at Logan. In 1993, the baseline year, Logan was the 6th busiest airport in the country. Air traffic controllers have made an issue of understaffing and inadequate equipment, leading to radar outages, a serious safety concern. (See App. 5). Noise and air pollution, traffic overload, parking lot sprawl, the threats to human health and safety, neighborhood degradation, and the failure to achieve a workable regional transportation policy, are all problems at and around Logan. 207.16

Logan has a nameplate capacity of 120 flights per peak hour. With 5 current runways, its current average 3-runway capacity during visual flight rules (VFR), is 120 planes per hour over 80% of the year (Vol. I, ES-16). Its annual average 3-runway capacity across all weather is 115 (Vol. I, ES-16). For the communities and Logan, even these numbers, so close to rated capacity, are too much, or we wouldn't be here on a proposal to increase capacity. Logan is subject to the constraints of wind and weather , which in turn are exacerbated by the volume of small planes using the airport, now 45% of the traffic (Vol. I, 4-5). By its own admission, almost 5 million people who drive to Logan every year are closer to other regional airports (an environmental crisis in itself) (Vol. I, 2-19).

Notwithstanding its stated intent to the contrary, the effect of Massport's efforts, including the $3 million spent on PR and consultants, and an ad campaign at Logan and in the media, will increase the airport's capacity and "improve" that 115 statistic. (See Vol. II, Letters 10,39). Massport has given short shrift to everything but its preferred alternative. What its analysis demonstrates is a "straw man" approach to alternatives that might reduce its operations: a reluctant and ultimately rejecting consideration of peak pricing, a 1-paragraph dismissal of a second airport (Vol. I, 2-4), a competitive and grudging assessment of other regional solutions (in fact, the rail, regional airport and telecom "alternatives" can be considered part of the No Action alternative). No Action, while it is required as an alternative under NEPA analysis, is not a reasonable option for the communities, inconsistent with the goal of environmental protection, and not responsive to issues such as safety. To allow Massport to conduct this analysis without proposing a significant alternative to the growth of the airport is to make a mockery of NEPA. 207.16 (cont.) Whatever Massport thinks the capacity should be, community residents from at least 28 cities and towns have been vociferous in their many meetings with Massport and the FAA, in their noise complaints, and through their local, state and federal representatives, that the human carrying capacity in this area has been exceeded-a critical point left out of Massport's analysis. 207.17

This is not an alternatives analysis, as that term is ordinarily understood. For the public, as Betty Desrosiers' presentations made clear, there is no real alternative. Massport's promise is blunt: flights will come and go, more and more (22,000 more in Chelsea), the growth will be vigorous, and the only choice is whether this growth occurs with or without Runway 14/32.

Alternatives must be evaluated in terms of their context, the challenge of a reasonable transportation policy for Boston and the region. If the problem that Massport chooses to deal with is delay, at least one of its alternatives should focus on a solution that would solve delays while minimizing or avoiding environmental impacts. The environmental secretaries directed Massport to explore ways of accomplishing its goals without airfield improvements (Vol. II, ENF Cert.), and to consider operations restrictions as a mitigation measure (Vol. II, Letter 1.21). These directives are ignored or minimized in the alternatives analysis. 207.18

Massport has overlooked an important alternative that deserves consideration from both the airport and community perspectives. A meaningful alternative that would accommodate travelers and communities would be to reassess the effective capacity of Logan with the goal of shifting traffic now, and creating a well-functioning, right-size airport in the context of livable communities. It is not in the city's or the region's interests to reduce the quality of life in 28 communities, to destabilize areas such as Chelsea, or to impose additional environmental burdens on a population that is already pleading for relief. Airport capacities have been modified, and there is no reason those modifications cannot be downward, in line with public health and safety; business pressure and the convenience of the traveling public have to be secondary concerns to safety and health. 207.19

Using a workable capacity cap, Logan could reduce its delays and begin to remediate the environmental damage to the surrounding communities. This alternative would provide an incentive to reroute traffic to other airports that could accommodate them (the regionals have a market penetration rate of 51%- Vol. I, 2-21). The cap of 120 that Massport aspires to, after all, represents a choice, a model really. It was set notwithstanding all the "constraints" that Massport claims prevent a new cap (see Vol. II, Letters/Non-Responses 30.08, 31.53, regarding caps and forcing mechanisms to shift traffic). Logan's capacity needs to be set at a workable level.

In addition to the above concerns about the "Preferred Alternative" alternative, I take issue with the analysis of Reduced Minimums as a method of reducing delay. Consistent with its goal to increase capacity statistics, this proposal would reduce the altitude minimums for when pilots could rely on instrument flight rules rather than visual flight rules, for landings (IFR vs. VFR). Currently, 1 of 5 runways is used for IFR landings. The proposal would extend IFR to 4 other runways. The FAA asserts that this would ensure the greatest availability of runways during poor weather, consistent with current industry practice for major commercial airports (Vol. I, 3-36). The critical difference from current practice, is that the current mimimums would be reduced by half, so that the point at which a pilot must see the runway will be closer than now.

This proposal ignores the fact that Logan is not like most major commercial airports. It's very small, it's surrounded by homes and downtown Boston, and its flight paths over these areas pass many hazards. Densely-populated residential neighborhoods come up to the airfield. Along the flight paths, planes fly over a major power plant, an LNG facility, several oil tank farms, the Tobin Bridge and 2 other bridges that are major thoroughfares into East Boston and downtown Boston, and hills. Whatever safety advantages there are to flying on IFR are cancelled out by the increased risks of flying over this terrain without a visual check. 207.20

Once again, a measure has been proposed without adequately considering the specific environment of this airport, rather than a modelled, hypothetical "major commercial airport". Many airports do not present the obstacle course that Logan's surroundings do. The extra measure of safety that VFR provides for these densely-populated communities is the real safety issue. As it is, the landings and takeoffs over the roofs of homes in Chelsea, East Boston, Revere and Winthrop are heart-stopping. There is no margin for error; we are already flirting with disaster.

The proposal admits that reduced minimums will have an insignificant impact on delay (Vol. I, 8-2). The real point of this alternative seems to be to boost the numbers of runways that can be used in adverse weather. That is, of course, precisely when you should not be flying over power plants, LNG and oil tank facilities, bridges and densely-populated residential ares at under 300 feet, without a visual check as well as every other kind of check you can manage. In 1995, Massport and the FAA did not respond to these safety concerns raised by residents (see Vol. II, Letters 12.1, 14.10, 30.1) The lack of awareness and respect 207.21 for the surrounding communities that this alternative reflects is symptomatic of the myopia of Logan's planning. I urge the FAA to withdraw this proposal, or the reviewing agencies to reject it as inadequate in its analysis.

ENVIRONMENTAL JUSTICE ANALYSIS

Massport's Environmental Justice (EJ) analysis is also flawed. Both within the specific poverty and race guidelines of the Presidential Order, and a broader analysis based on the principle of proportionality, Massport's proposal fails the test of environmental justice. 207.22

Because this analysis is based on noise contour maps, its numbers are understated and unreliable. It is impossible to know from its analysis how many people who are minorities or below the poverty line (BPL) are disproportionately affected by its operations. Massport's noise contour map excludes significant numbers of people in Chelsea, including poor, minority and immigrant populations. For example, one of the areas in Chelsea most affected by Massport's air and ground operations is the waterfront, specifically the areas to the east of the Tobin Bridge. According to a study funded by EPA, these areas contain large populations that are BPL and minority (App. 6). These figures are not reflected in Massport's analysis, which has all the intellectual rigor of a schoolkid writing "There is no EJ issue here" 100 times on a blackboard. 207.23

There is another EJ issue that Massport fails to acknowledge. The principle of EJ is based on the notion of proportionality and the reality that certain populations are disproportionately affected by polluting activities. There is a huge issue of EJ having to do with the current, disproportionate impact of Massport and other government and private operations on the communities around Boston Harbor. 207.24

After 3 careful reviews, I cannot recognize my neighborhood in this proposal. Chelsea is the smallest city in the state. At 1.8 square miles, it suffers environmental assault out of all proportion to its ability to absorb it. Residents

experience: millions of passenger and commercial vehicles
every month on the Tobin Bridge (2,000,000 vehicles a month@
Massport), and Routes 1 and 16 (within 50 feet of residences
for the bridge), the downwind emissions of Sithe/Mystic
Power Plant, one of the state's Dirty Dozen, an LNG facility
on its border with Everett, thousands of 18-wheelers on
residential streets carrying air cargo to Logan (an operation
that Massport has encouraged, and that runs within
25 feet of residences on the densely-populated Chelsea and
East Boston waterfronts, without any attempt by Massport
to reroute it), the largest salt pile in the Northeast,
which is uncovered and which supplies Massachusetts cities
and towns/ running 18-wheeler dump trucks through residential
streets in Chelsea), truck traffic to the New England Produce
Center which supplies New England and eastern Canada,
several oil tank farms, an asphalt facility, 44 c. 21E toxic
sites, thousands of parking spaces on the waterfront for
Logan employees and passengers, and lots of dirty businesses,
such as recyclers of toxic materials. The public health
statistics for Chelsea show elevated levels of illness and
disease. The noise and air pollution is obvious and distressing
on any visit to the city. Massport's proposal
does not give you a clue as to this context and the role
it plays in the continuing assault on the safety, health
and quality of life for people who live in Chelsea. And
this is the target area for Massport's improvements. Massport
and the FAA are "committed" to maximizing the use of
the runways that currently blitz Chelsea: 15R/33L,for late 207.25
night flights in particular, between midnite and 6 a.m.
(Vol. I, 5-12) and to run the greatest number of additional
flights:22,000, overhead. To allow Logan to expand its operations,
air and ground, through communities like Chelsea, is unconscionable.
In environmental terms, it is to institutionalize
a sacrifice area. No community should have to endure this.

Similarly, the other communities most affected by Logan's ground and air operations are also communities which bear more than their share of activities that nobody wants but everyone needs: the MWRA sewage plant (Winthrop), several major highways (Revere, E. Boston, Chelsea, Charlestown), the Callahan and Sumner Tunnels (E. Boston), a coal and oil-burning power plant (Everett and downwind communities such as Chelsea and Charlestown), the Tobin Bridge (Charlestown and Chelsea), an LNG facility (Everett), oil tank farms (Chelsea, E. Boston), thousands of parking spaces for Logan (E. Boston, Revere, Chelsea), MBTA bus depots (Roxbury), dozens of 21E sites and brownfields (throughout the area; 44 21E sites in Chelsea alone), the Big Dig (downtown Boston, Fort Point, North End),......These are communities that have borne a disproportionate environmental burden for city and regional projects. As necessary as these projects are, the communities and the people who live in them have a limited capacity to absorb this environmental assault. To go from bad to worse, with or without Runway 14/32, is to go in the wrong direction. More of the same is not an environmentally sound policy or responsible community planning in this matter.

This entire context is omitted in Massport's analysis of EJ. Massport gives a very different picture of what is at stake. "Within the box" of Massport's analysis, the agency continues its m.o. of understating impacts and overstating benefits; it fails to give an accurate picture of the context in which growth is occurring. "Outside the box" of its analysis, there is a world of pain that Massport needs to take responsibility for: hours of screaming jets over residential neighborhoods, day, night, weekends, and holidays, at altitudes below 300 feet, excessive truck traffic in residential neighborhoods, millions of passenger vehicles overburdening an already polluted environment, and the destabilization and blighting of neighborhoods.

Instead, Massport informs us that 507,000 operations isn't enough, and that this traffic will increase dramatically, but that there will not be any cumulative impacts to speak of. This is not justice, it's nonsense, it's dumping. To allow Massport to grow beyond a well-functioning capacity makes it unworkable and makes the communities around it unlivable. This is just the situation that the principle of EJ is meant to address. It is no more acceptable to allow disproportionate impacts in areas with working-class, poor, minority, immigrant and diverse urban populations than it is to allow continued dumping in areas that meet the bright-line criteria of 50% of population BPL or minority. Environmental justice is an encompassing principle; a key element is the concept of proportionality and that is exactly what the areas around the airport represent now-disproportionate impact. We need protection from the destructive growth of Logan, with or without 14/32.

Massport must be given incentives to create a workable airport and to remedy neighborhood damage it creates. It does not, for example, consider increasing the percentage of Stage 3 aircraft despite its claims for them (Vol. I, 5.8), restricting night time flights despite the disturbance they cause (Vol. I, 5.9). Justice is not served by denial of impacts or inadequate mitigation. Justice is something that every community has the right to expect, whether it is in Winchendon, Chelsea, Bedford, E. Boston, Dover, Revere, Roxbury, or Winthrop. What would be justice for the communities around the airport?

CONCLUSION

The evaluation of this proposal cannot be solely about the terms that Massport and the FAA have set it in: delay. Delay is as much a symptom of the problem as the problem itself. The root problem is that, even operating at an annual average over all conditions of 115 operations per hour, Logan is operating beyond its effective capacity. 207.26 For some time, it has been operating well beyond the carrying capacity of the communities whose residents eat its impacts. Even the airport has problems accommodating growth of 112+% over 20 years. Human beings simply can't take the air and noise pollution, the disruption of home and community life that has come with this explosive growth. This proposal needs critical attention and the communities need your protection, because at stake here is much more than the hypothetical $313 million delay costs to airlines and passengers and Logan's standing in the delay statistics. At stake is the livability of the 28 surrounding communities whose long-standing protests against Logan's environmental damage have been ignored. The goal of accommodating 120 flights per hour is a preconceived notion of what a safe, environmentally sound, workable capacity is for this airport in this place. Quality of life is not just a slogan for the people who live with the airport's impacts. In Chelsea, where I have experienced these impacts for several years, what is at stake is the viability of a community that is a sacrifice area otherwise, as far as polluters are concerned; and Massport is chief among those polluters.

Something is wrong when modeling and monitoring fail to reflect reality and do so in ways that systematically understate impacts. Something is wrong when an analysis fails to account for community feedback on the reliability of your data. Something is wrong when an alternatives analysis gives us the choice of whether to accommodate growth that is beyond human and airport capacity, with or without a new runway. Something is wrong when an environmental secretary's directive to conduct a sensitive Environmental Justice analysis produces a 3 and 1/2 page mechanistic use of a flawed noise contour map to conclude that there is no EJ issue in areas known to be environmental dumping grounds for private and public business. Something is wrong when Massport's proposal provides disinformation, fails to respond to specific scoping directives, and produces a picture of local conditions that bears little or no resemblance to reality.

The communities need reliable information, remediation, and your protection (see App. 7). What needs protection here are the physical and human environments of the communities that suffer Logan's impacts. These communities have protested for years that the impacts are worse than Logan will admit, and that those impacts threaten the public health and safety.

What does not need protection here are business interests, which are highly elastic, and which have a flexibility that neighborhoods do not; they can and will adapt, market style, to shifts in operations, reduced capacities at Logan, or the need to go to another airport to get to Boston.

What also does not need protection here is the desire of Massport and the FAA to achieve a better standing in delay statistics. This is not a football game, this is a matter of how this airport will fit into this city, and the safety, health, economic, aesthetic and social impacts on people's lives.

Finally, this cannot be an exercise to protect the power of a government agency to spend $3 million plus of public money on PR, consulting and advertising in order to design a pre-ordained "Preferred Alternative".

What this proposal was supposed to do, but has not, was to accurately inform the public and the environmental agencies about actual impacts of current and proposed operations, propose meaningful alternatives including effective mitigation, and conduct a sensitive environmental justice analysis. Unless we hold Massport to basic standards of accuracy and comprehensive, reasonable planning, we allow a bad situation to get worse. We create a disincentive to create a responsive, imaginative solution to Logan's problems as an urban airport, And we condemnm the surrounding neighborhoods to further degradation, loss of community viability, and the disruption of health and quality of life. We need the informed environmental consideration that NEPA guarantees. Massport's record demonstrates that it is either unwilling or unable to account for the actual impacts of its operations or to remedy them. Among the information and initiatives that are needed are: coordination and funding of agencies to provide data on air and noise pollution and epidemiology, such as the Department of Public Health and the state transportation departments, especially the regional and highway departments; adequate and accurate monitoring of air and noise pollution in areas that reflect those impacts; consideration of improvements such as a ban on night flights and rerouting of passenger and truck traffic away from residential areas; a collaborative process that gives the communities a real influence over airport operations that affect them, and that reflects real alternatives to Logan growth as part of a regional transportation policy; and ways to ensure that there is 207.27

an independent, competent assessment of Logan's impacts. Massport has "...become the prisoner of (its) tactics, seldom looking behind them at the strategies." (Jane Jacobs, The Death and Life of Great American Cities, p. 322, Vintage 1992). Residents cannot afford such short-sighted planning. We need what Massport calls "sufficient relief", and this ain't it.

Given the defects in its proposal, it would be appropriate for Massport to withdraw it and go back to the drawing board for planning that will achieve a workable airport and livable communities. If Massport will not do that, I urge you to reject this proposal as inadequate, under NEPA and the scoping directives of the environmental secretaries. We can do much better than this. We have to.

"We cannot solve the problems we have created with the
same thinking that created them."

Einstein

APPENDIX 1

Table of Noise-Exposed Population by Community, 1994/1995 Logan GEIR Updates

Table 6-3
Noise-Exposed Population by Community

Year	80+ L_{dn}	75-80 L_{dn}	70-75 L_{dn}	*65-70 L_{dn}	Total (65+)	60-65 L_{dn}
Boston**						
1987	0	533	6,436	40,020	46,989	NA
1990	0	0	1,778	28,970	30,748	NA
1993	0	0	264	2,820	3,084	NA
1994	0	106	265	7,698	8,069	30,895
1995	0	106	851	8,815	9,772	33,765
1996	0	106	374	8,775	9,255	40,992
1999	0	48	58	3,413	3,519	16,020
2010***	0	48	58	1,398	1,504	12,107
2010†	0	48	58	1,926	2,032	12,804
Chelsea						
1987	0	0	2,635	4,457	7,092	NA
1990	0	0	0	4,813	4,813	NA
1993	0	0	0	0	0	NA
1994	0	0	0	0	0	8,510
1995	0	0	0	95	95	9,750
1996	0	0	0	0	0	8,744
1999	0	0	0	0	0	4,490
2010***	0	0	0	0	0	2,788
2010+	0	0	0	0	0	3,065
Everett						
1987	0	0	0	287	287	NA
1990	0	0	0	0	0	NA
1993	0	0	0	0	0	NA
1994	0	0	0	0	0	0
1995	0	0	0	0	0	0
1996	0	0	0	0	0	0
1999	0	0	0	0	0	0
2010**	0	0	0	0	0	0
2010+	0	0	0	0	0	0

APPENDIX 2

3/98 Massport Measured Ldn Noise Levels Report 1991-1997

Mar-98

Measured Ldn Noise Levels Report

Summary of Measured
Day-Night Equivalent Sound Levels
Summary to Date

Area	Location	Site No	1991	1992	1993	1994	1995	1996	1997
South End	E Dedham	1	66.0	64.6	66.2	66.3	65.9	66.4	65.8
S Boston	Bolton St	2	69.9	68.1	67.5	68.1	68.2	69.0	69.4
S Boston	SB Yacht Club	3	67.8	69.4	69.3	68.2	68.1	66.8	67.1
Winthrop	Grandview	4	80.0	79.7	79.8	79.1	79.6	78.8	80.4
Winthrop	Faun Bar	5	72.5	72.7	73.3	72.0	71.7	71.7 *	71.1
Winthrop	Somerset	6	71.7	71.1	71.1	71.5	71.0	71.1	71.4 *
Winthrop	Loring Rd	7	74.1	74.1	74.1	74.1	73.4	73.8	74.4
Winthrop	Morton St	8	68.7	67.6	68.4	66.6	67.2	67.8	68.2
E Boston	Annavoy	9	75.1	75.8	75.6	76.0	75.8	75.7	76.0
E Boston	Shawsheen	10	71.4	71.2	71.3	70.6	70.2	70.8	71.9
E Boston	OH Hill	11	Not in	Not in	Not in	Not in	Not in	66.4 *	66.8
E Boston	EB Yacht Club	12	73.9	73.2 *	Down	71.7 *	71.6 *	72.7	72.7
E Boston	EB High	13	68.4	66.5	64.9	65.4	66.4	66.5	67.1
E Boston	JP Yacht Club	14	69.1	67.5	67.4	65.7	66.6	66.9	67.0
Chelsea	Admiral's Hill	15	69.1	Down	Down	67.0 *	67.2	68.5	67.6 *
Revere	Bradstreet	16	71.8	71.3	71.4	69.9	71.8	72.3	71.9
Revere	Carey Circle	17	66.4	67.2	66.4	66.8	66.7	66.7	66.7
Nahant	CG Rec Facility	18	68.8	68.3	69.1	66.2	66.7	66.7 *	65.8
Swampscott	Smith Lane	19	58.7	57.6	58.8	56.8 *	56.8	56.7	56.9
Lynn	Flax Pond	20	65.5	59.3 *	60.6	59.4	58.8	59.9	59.2
Everett	Prescott	21	60.6	62.4 *	62.9	60.2	60.6	60.7	61.0
Medford	Magoun	22	61.7	61.3	59.6	59.6	60.2	60.0	60.7
Dorchester	Myrtlebank	23	63.8	63.4	63.6	63.2 *	62.8	62.5	62.7
Milton	Cunningham Pk	24	60.6	60.9	61.8	60.7	60.6	60.6	60.6
Quincy	Squaw Rock Pk	25	58.5	58.6	59.5 *	56.6 *	57.2	57.9	60.1
Hull	Hull HS	26	72.0	65.0	65.7	64.1	63.7	63.6	63.7
Roxbury	Bos Latin Academy	27	Not in	Not in	Not in	Not in	Not in	Not in	64.7 *
Mattapan	Lewenberg School	29	Not in	Not in	Not in	Not in	Not in	Not in	59.4 *
East Boston	Piers Park	30	Not in	Not in	Not in	Not in	Not in	63.6 *	63.4

* Partial

TABLE 5.2-4 1993 CALCULATED DNL, LeqN and Lmax VALUES

Identity	Location	DNL (dB)	LeqN (dB)	Lmax (dB)
1	Andrew St., South End	57.9	49.6	91.3
2	B & Bolton, South Boston	66.2	57.9	101.6
3	S. Boston Yacht Club, S. Boston	64.1	53.9	94.4
4	Bay View & Grand View, Winthrop	78.1	68.4	120.5
5	Harborview & Faun Bor, Winthrop	71.5	62.2	99.7
6	Somerset & Johnson, Winthrop	68.0	58.8	89.7
7	Loring Rd. near Court, Winthrop	78.0	68.1	104.7
8	Morton & Amelia, Winthrop	68.5	56.7	103.6
9	Bayswater & Nancia, E. Boston	73.8	62.3	110.0
10	Bayswater & Shawsheen, E. Boston	68.2	57.5	96.5
11	Don Orione, E. Boston	63.3	53.1	90.3
12	E. Boston Yacht Club, E. Boston	72.7	63.7	93.0
13	E. Boston High School, E. Boston	68.5	61.8	103.4
A	Summer near Lamson, E. Boston	63.0	55.2	81.8
14	Jeffries Point Yacht Club, E. Boston	64.5	56.2	84.8
15	Shurtleff & Essex, Chelsea ?	66.6	59.9	102.7
16	Bradstreet Ave. & Sales, Revere	70.6	60.3	104.1
17	Carey Circle, Revere	60.4	50.2	92.3
23	Myrtlebank/Hill Top, Dorchester	53.3	43.4	81.1
24	Cunningham Park, Milton	52.4	43.1	77.3
25	Squaw Rock Park, Quincy	50.8	41.4	78.7
26	Hull High School, Hull	55.6	47.7	86.0
E	Farragut @ 2nd, S. Boston	64.4	54.2	94.5

Table 5.2-5 summarizes the data for night time above (TAN) and 24-hour time above (TA24) for noise thresholds ranging from 55 to 95 dB. Note that the minutes in TAN are contained in those presented for TA24. These data give an insight into the statistics of the noise in terms of sound level and duration. The positions which appear to have the highest values of TA24, based on thresholds of 75 dB and over are NMS #s 4 (Bay View & Grand View), 5 (Harborview & Faun Bar), and 7 (Loring Road near Court) in Winthrop and NMS #s 9 (Bayswater & Nancia) and 12 (East Boston Yacht Club) in East Boston. These five locations also have the highest values of DNL. Further, the noise at NMS # 7 and 12 exceeds 55 dB for over 50 percent of the 15 hour day from 7:00 AM to 10:00 PM, and 65 dB for about 25 percent of the day. Both of these locations receive noise from operations on several runways.

APPENDIX 3

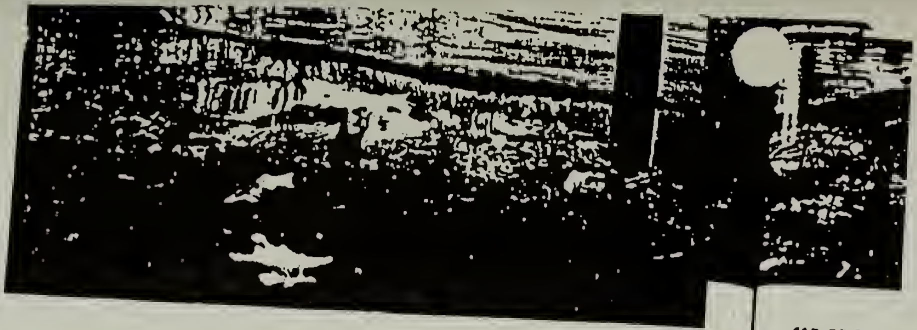
4/99 Boston Magazine:Massport Statistics on Max dB friends established the Marblehead Cancer Preventio Project to combat some of their area's environmental hazards. "We were standing in her garden talking about how brave and amazing Norma had been when we asked, Why should we have to be brave? Why can't we be safe?" recalls *Boston Globe* columnist Linda Weltner, a Marblehead resident and one of the group's founders. "In that setting, we made a date to get together and talk about what could be done."

When the group of nine was founded a year and a half ago, one member had cancer, and is now in chemotherapy. Two have since been diagnosed—one with breast cancer and one with melanoma, both caught in the early stages. The cancer prevention group's cancer ratio is itself now an alarming one in three.

"Norma's activism spoke to a large number of people, and because of that, we had a great concern to keep it going. She was an instigator," says Christina Ryke, a group member who survived breast cancer in the late '80s. A few years ago, she was diagnosed with cancer again — this time, ovarian. "I had lived in a neighborhood where I felt there was a high incidence of cancer, and started writing down where people lived and what they had back in the late '80s. I found there was a lot of cancer in one little block. It's very intimidating, very scary. We are due for an enormous look at this because there's no question there's something happening."

THESE ARE THE KINDS OF STORIES AND STATISTICS THAT ARE increasingly catching the attention of people all over the country, and nowhere more so than in eastern Massachusetts. After all, it was here that ominous questions about the effects of environmental toxins were made larger than life by the book and John Travolta film *A Civil Action*, based on the plight of eight Woburn families who lost children to leukemia they believed to have been caused by trichloroethylene (TCE) in their water supply.

But Woburn is not the only area with a so-called cancer cluster, or potentially hazardous pollution. Nor are such problems limited to gritty industrial towns or low-income areas. Melanoma rates in Concord, Cohasset, and Orleans are even higher than in Marblehead. In Newton, an unusual number of residents have contracted cancer in a small area adjacent to a chemicals-laden dump. And Cape Cod has been recognized for years as an area dotted with cancer clusters, believed by some to be linked in part to a military base at the start of the peninsula.



"There's only one plausible explanation: There's something in the environment," says David Ozonoff, a physician and chair of the department of environmental health at Boston University. "The other two factors are genetics and lifestyle. There's no difference of lifestyle there—they eat the same crap there that everyone else does. And genetically they're not any different. It's not as if it's an isolated population in the Galapágos Islands. The only explanation here is that there's some factor or factors in the environment."

Scientific acronyms like TCE, PCB, and DDT are not just for scientists anymore: they're becoming household names as communities seek more information on the toxins in their towns that are suspected of causing sickness and death. Some are concerned about illnesses that seem to crop up in high numbers around their neighborhood, some raise questions about suspicious dumping sites nearby, and some are even nervous about effects of environmental hazards on their property values.

As public awareness grows, so does a hunger for information. The state Department of Public Health fields about 3,000 requests a year from concerned citizens asking for investigations of suspected cancer clusters, so many that the agency admits it can't keep up. "There's a triage system by which we try to determine which seem to be the cases most worth putting in time and resources," says Mark Leccese, the department's director of public affairs. "But at the same time, there are other unnoticed areas where we might have reason to suspect something even if the numbers don't suggest it. A certain illness or cancer might be at the expected level, but what if it all occurs in children born in the same year?"

In the adjacent foldout chart, *Boston Magazine* has juxtaposed statistics on some of the most common cancers with information about

SOUND CHECK

Maximum aircraft noise, in decibels.
(A typical lawnmower produces about 90 decibels: an airplane taking off produces 140.)

Winthrop	**120.5**
East Boston	**110.0**
Revere	**104.1**
Chelsea	**102.7**
South Boston	**101.6**
South End	**91.3**
Hull	**86.0**
Dorchester	**81.1**
Quincy	**78.7**
Milton	**77.3**

SOURCE: Massachusetts Port Authority

Ed Quinn

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APPENDIX 4

Logan Complaint Log 1976-1996

Historical Aircraft Disturbance Complaints Logan International Airport 1976-1996

	1976	1977	1978	1979*	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991**	1992**	1993	1994	1995	1996
Arlington	1	4	2	21	32	6	3	9	2	0	2	4	1	8	2	10	8	3	0	2	3
Belmont	0	9	6	20	7	5	9	1	4	0	0	2	0	0	0	0	6	5	0	0	1
Boston (Total)	380	786	921	3829	1856	936	828	413	434	325	357	523	493	509	422	1480	1579	1016	1016	931	866
Brighton	0	0	50	18	3	0	0	0	1	0	0	0	1	0	1	4	1	1	1	0	3
Charlestown	8	2	2	7	7	2	0	6	1	2	2	5	1	1	0	2	4	2	4	9	7
Dorchester	21	9	42	423	60	12	7	6	4	1	5	39	11	13	14	37	43	17	13	36	10
East Boston	145	481	338	1061	577	324	403	263	284	175	141	159	153	282	193	234	466	475	539	381	361
Hyde Park	0	0	1	29	13	6	2	21	5	1	4	1	0	0	0	11	3	0	3	0	1
Jamaica Plain	72	135	139	560	293	152	151	45	51	56	93	195	224	96	84	289	243	123	98	106	107
Roslindale	4	0	14	120	210	92	69	21	30	29	21	22	11	17	4	19	87	34	9	16	22
Roxbury	25	10	28	118	48	39	21	13	17	7	20	11	13	10	13	11	6	20	10	15	7
South Boston	72	77	213	855	368	207	88	9	14	20	22	55	42	41	47	250	299	96	111	117	201
South End	0	23	27	296	140	41	35	10	4	8	1	4	6	2	28	545	349	207	192	104	100
West Roxbury	8	0	41	97	68	56	39	10	9	22	33	14	7	24	4	35	8	9	1	6	10
Other	27	49	26	47	69	5	13	9	14	6	15	18	24	23	34	43	72	32	35	141	37
Braintree					15	0	0	0	0	0	3	0	2	4	5	32	47	22	24	18	8
Brookline	7	13	33	426	158	21	13	4	6	5	5	13	8	12	12	84	225	20	5	13	32
Cambridge	25	54	27	170	37	6	9	9	1	3	22	18	24	14	14	34	49	31	13	33	19
Chelsea						14	27	11	6	2	8	3	5	17	16	11	27	18	17	24	485
Cohasset				0	146	7	10	20	16	10	6	2	2	2	0	0	6	0	1	1	4
Dedham				0	17	8	1	1	0	0	2	0	0	1	1	5	2	2	2	3	4
Everett	11	0	9	26	10	7	27	10	10	5	2	0	1	3	5	4	16	2	0	4	24
Hingham	1	0	4	112	97	21	23	6	4	1	1	2	4	4	3	14	42	16	15	4	5
Hull	1	0	63	361	1330	144	68	33	16	13	13	22	22	20	21	41	72	78	45	44	27
Lynn	1	8	36	37	61	45	25	10	4	2	11	15	6	3	4	2	3	3	2	2	2
Malden	8	4	3	19	5	0	32	9	4	1	1	2	1	0	4	1	8	3	4	1	7
Marblehead	0	0	0	0	3	1	0	0	0	3	15	4	2	1	2	0	2	0	2	2	4
Medford	26	56	24	58	118	105	65	29	13	11	10	28	37	23	15	15	36	3	5	24	19
Melrose	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	1	3	1	2	2	1
Milton	1	0	308	1392	583	387	163	165	114	70	105	117	98	77	149	586	308	425	249	204	369
Nahant	5	8	80	22	17	12	0	10	1	0	13	8	10	5	2	23	206	292	74	102	152
Needham	4	3	3	120	238	10	27	30	29	27	25	37	22	2	0	9	9	1	3	19	3
Newton	3	8	2	78	24	4	14	3	3	1	0	4	3	3	5	28	29	5	2	7	1
uincy	71	34	4527	4525	860	218	109	97	104	63	79	53	38	34	16	92	72	51	16	17	39
evere	27	46	157	319	129	93	27	78	39	20	99	41	57	47	132	109	165	798	918	199	476
augus	0	0	0	3	0	0	0	0	0	0	2	0	0	0	1	7	4	6	0	2	0
cituate	0	0	0	0	135	10	5	10	3	1	2	0	1	2	2	2	0	1	3	0	1
omerville	15	30	8	86	23	7	7	12	3	1	5	17	3	6	5	8	50	18	13	15	16
wampscott	0	0	0	0	0	4	1	125	106	71	167	82	29	12	26	27	3	36	2	0	8
Veymouth	0	0	1	11	22	7	13	19	134	160	30	91	137	85	104	75	170	113	138	109	213
Vinchester	11	49	23	24	16	0	12	2	1	1	10	5	1	6	1	1	2	0	0	12	10
Vinthrop	75	96	589	2278	1303	648	288	211	240	107	277	795	389	663	1003	817	542	899	664	717	938
Vobum	0	9	8	20	0	0	2	0	0	0	1	1	0	0	1	11	12	2	3	0	4
ther	52	32	213	243	160	27	24	21	25	3	20	20	38	51	50	70	87	63	44	34	172
OTAL	725	1247	7047	14000	7402	2753	1832	1348	1322	906	1294	1909	1434	1615	2023	3599	3790	3933	3282	2545	3913

Alternative flight tracks were being tested on Runway 22.

* Alternative flight tracks were being tested on Runway 27 (Nov. & Dec. 1991, Jan. & Feb. 1992).

APPENDIX 5

Boston Globe 6/18/98 ATC Article: Radar Outages/ Understaffing

Air traffic controllers tell of computer problems

■ FAA
ontinued from Page A1

Radar outages worry air traffic controllers

By Matthew Brelis
GLOBE STAFF

Air traffic controllers directing planes flying at igh altitudes over New England and upstate New ork say that their radar screens have gone blank or ozen up almost daily since April and that there are t enough technicians to keep the system running.

The cause of the malfunctions is a computer sysm installed in 1972 that is failing with increasing equency.

While the Federal Aviation Administration acowledged problems with the computer system in e Boston Center and at other facilities around the untry, a spokesman said that the air traffic system s safe and that the agency has no records of daily lures.

Controllers and technicians, however, say the sysn is being stretched to the breaking point.

"The system is falling apart," said William Johan-s, president of the local chapter of the National Air affic Controllers Association, representing control-

FAA, Page A35

lers at the Boston Center in Nashua.

The most recent example of the problems came Tuesday afternoon, when a controller in Westbury, N.Y., momentarily lost track of Air Force Two's speed and altitude as the plane carrying Vice President Al Gore approached Newark International Airport. The DC-9 was 12 minutes from landing when crucial data – the plane's call sign, altitude reading, ground [illegible] nd angle of descent – disn [illegible] from the com-

Controllers rely on the computers and radar in their effort to maintain a safe distance between aircraft.

"The agency has now placed the national airspace system in jeopardy by allowing staffing in the radar unit to fall well below recognized norms," said Ed Dressell, the Boston Center's local president of the Professional Airways System Specialists, the union representing the technicians.

FAA spokesman Jim Peters said that safety has not been compromised by the computer failures. "Like any piece of equipment, you will experience problems on an intermittent basis," he said, adding that a back-up system has performed whenever the computer failed.

> 'The agency has now placed the national airspace system in jeopardy by allowing staffing in the radar unit to fall well below recognized norms.'
>
> ED DRESSELL
> *President, Professional Airways System Specialists*

Peters also said a special team was assigned to the Boston Center to find the cause of the problems and fix them. An FAA document obtained by the Globe, however, indicates that any repair is at least six months away.

Peters also said the center has adequate manpower.

Two years ago, seven certified technicians worked at the Boston Center to keep the computer system running. Today only three specialists are assigned to maintain a system that has to run 24 hours a day, every day of the year. As a result, in the last month alone, the three technicians have been ordered to work more than 60 hours of overtime. One of the technicians is eligible for retirement and Dressell said "burnout is becoming an issue," as the hours required to service the aging system begin to increase.

The lack of trained technicians was caused partly by the retirement of many who were not replaced in the last decade because the FAA believed a new system would obviate the need for so many technicians. That new system, however, is still at least two years away.

On May 29, the technicians' union asked the FAA to declare an emergency situation at the Boston Center. That move would have been embarrassing but would have given the agency greater flexibility in staffing. Instead, the agency earlier this month called the repeated failures of the system a "substantial operational situation."

Meanwhile, Johannes said the outages have been occurring at an "alarming rate," and last anywhere from 12 seconds to two and a half hours. In 12 seconds, a plane can travel more than two miles. When longer outages occur, controllers use a limited back-up system, which requires a more time-consuming process to "hand off" a plane from one controller to another.

Controllers also are concerned that the back-up system may be down for routine maintenance when the primary system crashes. "If that happens, we won't have radar contact with anyone," Johannes said.

But, countered the FAA's Peters, even in that unlikely situation controllers would have radio contact with the airplanes and could slow all air traffic down considerably and increase the separation between planes to ensure there is no midair collision.

Air Force One, the plane used by President Clinton, disappeared twice in recent months from radar screens off New Jersey because of problems with the radar system.

"Air Force One is not the only plane disappearing from radar screens," said Scott Hayden, the local union vice president. "Unfortunately, these things happen every day to other aircraft as well."

oston Globe 6/18/98

APPENDIX 6

11/96 EPA/Massachusetts Toxics Campaign Fund Study: Industrial Pollution in Chelsea

INDUSTRIAL POLLUTION IN CHELSEA

AN ENVIRONMENTAL SURVEY BY

THE MASSACHUSETTS TOXICS CAMPAIGN FUND

November 1996

Funded by the U.S. Environmental Protection Agency

INDUSTRIAL POLLUTION IN CHELSEA

Summary

* From 1987 to 1994, as part of normal production, industrial companies in Chelsea reported that they released 666,188 pounds of toxic chemicals into the environment, or 83,274 pounds each year. Nearly all of this amount was released directly into the air. Over 95% of the air releases were made of three toxic chemicals: 1,1,1-trichloroethane, xylene, and toluene. These three chemicals can seriously damage human health. These companies are located mainly in the industrial area in the northeastern part of the city near Revere and the Chelsea River.

* Seven companies reported emergency releases of toxic chemicals (mainly fuel) during the 1987-1995 period. Some of these releases were very large. One was greater than 200,000 pounds of fuel. These companies are located mainly along Eastern Avenue and the waterfront area.

* Numerous other small, non-emergency releases of toxic chemicals took place, not only in industrial areas, but at several schools, too. High concentrations of lead and other toxins were turned up at the Williams and Shurtleff Schools.

* Chelsea is home to 44 toxic waste sites, also called "21E" sites, scattered throughout the western industrial area (near Everett) and the eastern waterfront industrial sections. Some of these sites contain hazardous waste, while most contain petroleum waste. These areas are known as "brownfields". Most of these sites are still far from being cleaned up.

* Chelsea's four biggest users of toxic chemicals used over 2.5 million pounds of reproductive toxins in 1993. These chemicals can damage the human reproductive system.

* Higher levels of pollution appear to be present in neighborhoods with a higher percentage of low income residents - particularly in low-income communities of color - while fewer sources of industrial contamination are found in higher income neighborhoods.

Scope of the Study

This study examines the extent of industrial pollution in Chelsea and its possible relation to socioeconomic status of Chelsea residents.

Lead poisoning is considered to be the main environmental health hazard in Chelsea, due to high incidence of older housing stock containing lead paint. In this study we do not quantify the extent of lead contamination and its health effects. We do recognize, however, the strong link between lead poisoning and a general lack of education about lead hazards and the lack of financial means among low income residents to have lead dangers removed.

Instead, we examine the extent of industrial toxic releases and their relation to socioeconomic status of Chelsea residents. Industrial and commercial pollution in Chelsea occurs in several ways:

1) As a frequent release into the environment from a factory or other business establishment. Businesses large enough are asked (voluntarily) to report what they emit into the environment each year to the U.S. Environmental Protection Agency. This information is compiled annually in the federal Toxic Release Inventory.

2) As an accidental release or spill. These are single events, not continuous or frequent releases over the period of one year, as is reported in the Toxic Release Inventory. Sometimes these releases are reported as an emergency, particularly if they are big. Other times, when they

are small and are not thought to pose a threat to the public, they are reported as non-emergency spills or releases.

3) As a "21E" waste site. 21E is a designation given by the Massachusetts Department of Environmental Protection to sites where significant amount of petroleum waste or hazardous waste have accumulated.

In addition, toxic chemicals used in production, and stored on-site at factories, are considered to be a potential health hazard, even if they are not actually released into the community.

Reported Toxic Releases from Industrial Production

According to the federal Toxic Release Inventory (TRI) Chelsea has experienced significant industrial toxic releases since reporting began in 1987. **Tables 1 and 2** show toxic releases from the Toxic Release Inventory for each year from 1987 to 1994. Total reported environmental releases have risen from 53,555 lbs. in 1987, to a peak level of 167,539 lbs. in 1989, then declining somewhat through 1992, before dropping off significantly in 1993 and 1994. Nearly all of the pounds released were released to the air.

The three major pollutants - 1,1,1-trichloroethane, xylene, and toluene - are chemicals which, at high enough levels, can seriously damage human health, including causing cancer. See **Table 3** for a brief description of the health effects from exposure to these chemicals.

The sources of this pollution are six industrial facilities. The largest emissions came from Emtex, Inc., and Glyptal, Inc., both located in the northeastern part of the city, near Chelsea Creek. At its peak, the largest polluter, Emtex (181 Spencer Ave.), released 140,844 pounds of 1,1,1-trichloroethane into the air in 1989 and 113,656 pounds into the air in 1992. Since 1992, however, there are no reported toxic releases from Emtex.

Glyptal (305 Eastern Ave.) released a peak level of 20,164 pounds of 8 chemicals into the air in 1989. Since then its releases have gradually dropped down to around 10,000 pounds in 1992-1994. The company's major pollutants are xylene and toluene.

Accidental Releases or Spills: Emergency and Non-Emergency

Seven companies reported emergency response releases or spills during the period of 1987-1995 (see **Table 4**). Most of these companies are located in the industrial areas along the Chelsea River. Nearly all of the releases or spills were gasoline or oil. Several releases were very large. Gulf Oil (281 Eastern Ave.) released 68,961 pounds of gasoline in 1992 and 13,200 pounds of kerosene in 1990. Amoco Oil (111 Eastern Ave.) released 203,000 pounds of fuel oil in 1993. B.A.T. Transportation (281 Eastern Ave.) released 15,250 pounds of gasoline in 1993. Coastal Oil (at Chelsea Dock) released 50,040 pounds of asphalt in 1994.

There were numerous smaller, non-emergency releases of toxic chemicals in the past several years alone, as documented by the Mass. Department of Environmental Protection. **Table 6** locates these smaller releases by census tract. Some of these smaller releases include heavy metals - such as zinc, copper, and lead - and relatively small amounts of fuel oil or petroleum hydrocarbons. Several releases are notable. The Shurtleff School (76 Congress Ave.) experienced a release of petroleum hydrocarbons (860 parts per million) and lead (490 parts per million) in June, 1995. There was a release of lead at a very high concentration (13,000 parts per million) at the Williams School (170-180 Walnut St.) in September 1994.

"21E" Waste Sites

Chelsea is home to 44 "21E" waste sites, as identified by the Department of Environmental Protection (see **Table 5**). Most of these waste sites contain petroleum waste, while seven sites contain non-petroleum hazardous waste alone, and 12 sites contain both petroleum and hazardous wastes. These sites are in various stages of clean-up (or "remediation"). But it appears that most of the sites are not close to being cleaned up. The waste sites are located at a wide variety of facilities, from the Williams School to Amoco Petroleum to Forbes Lithographic to the Chelsea Housing Authority. They are found largely in the city's western industrial area and the northeastern industrial area along the Chelsea River.

Many of these sites are considered "brownfields". This means that they are on vacant land, contain abandoned or vacant buildings, and have a slight or moderate degree of contamination. Brownfields are typically not seriously contaminated waste sites, such as a "Superfund" (as designated by the U.S. Environmental Protection Agency). Rather they are lands that could be put to other uses after an effective cleanup takes place. What should happen to these brownfields in Chelsea after they are cleaned up is an important issue.

Toxic Chemicals Used in Industrial Production

In addition to toxic releases and waste sites, many companies use toxic chemicals in their day-to-day production activities. **Table 7** shows the four biggest industrial users of toxic chemicals in Chelsea. Each of these companies also uses toxic chemicals which have been proven to cause reproductive damage in humans. Biltrite Corp., Emtex, Glyptal, and Marson Corp., together used 2,511,424 pounds of reproductive toxins in their production activities in 1993, as documented by MASSPIRG and the Greater Boston Physicians for Social Responsibility (1996). Reporting of amount of toxic chemicals being used or stored or produced at a facility is not a strict legal requirement; reporting is only voluntary. This means that numerous other businesses in Chelsea, especially small businesses, are probably using or releasing toxic chemicals without reporting it.

Pollution and Socio-Economic Status

The most significant industrial pollution sources in Chelsea are found in the city's eastern sections, in close proximity to residential neighborhoods, and in the sparsely populated western industrial section. The northeastern section of the city (census tract 1605) has the highest percentage of communities of color living below the poverty line. According to the 1990 Census (see **Table 9**), 49% of African-Americans, 50% of Asians, and 50% of Hispanics lived below the poverty line in Census Tract 1605. This tract experienced the highest level of continuous toxic releases (from the Toxic Release Inventory) (see **Table 8**). Also located in this section of the city are three auto body shops and two dry cleaners, potential sources of highly toxic releases which typically go unreported. In addition, a greater incidence of petroleum fuel spills and leaks occurred in this section than elsewhere in the city.

The two census tracts with the highest percentage of Hispanic residents, tracts 1602 and 1604, also demonstrated a higher incidence of toxic releases than other parts of the city. Percentage of Hispanics living below the poverty line was 41% and 47% in these two tracts.

Recommendations

1) The Chelsea Fire Department should check the Toxics Use Reduction chemicals (used in industrial production) against their files in order to ensure emergency preparedness.

2) Exact status of 21E waste sites should be made known to Chelsea residents by the Department of Environmental Protection. It is not clear as to how close to completion of cleanup each of these sites is.

3) There needs to be far better public access to information on industrial toxic hazards. The Department of Environmental Protection's online database is not yet very user friendly. Getting access to environmental information at DEP is a very time-consuming process; the average citizen does not have this kind of time.

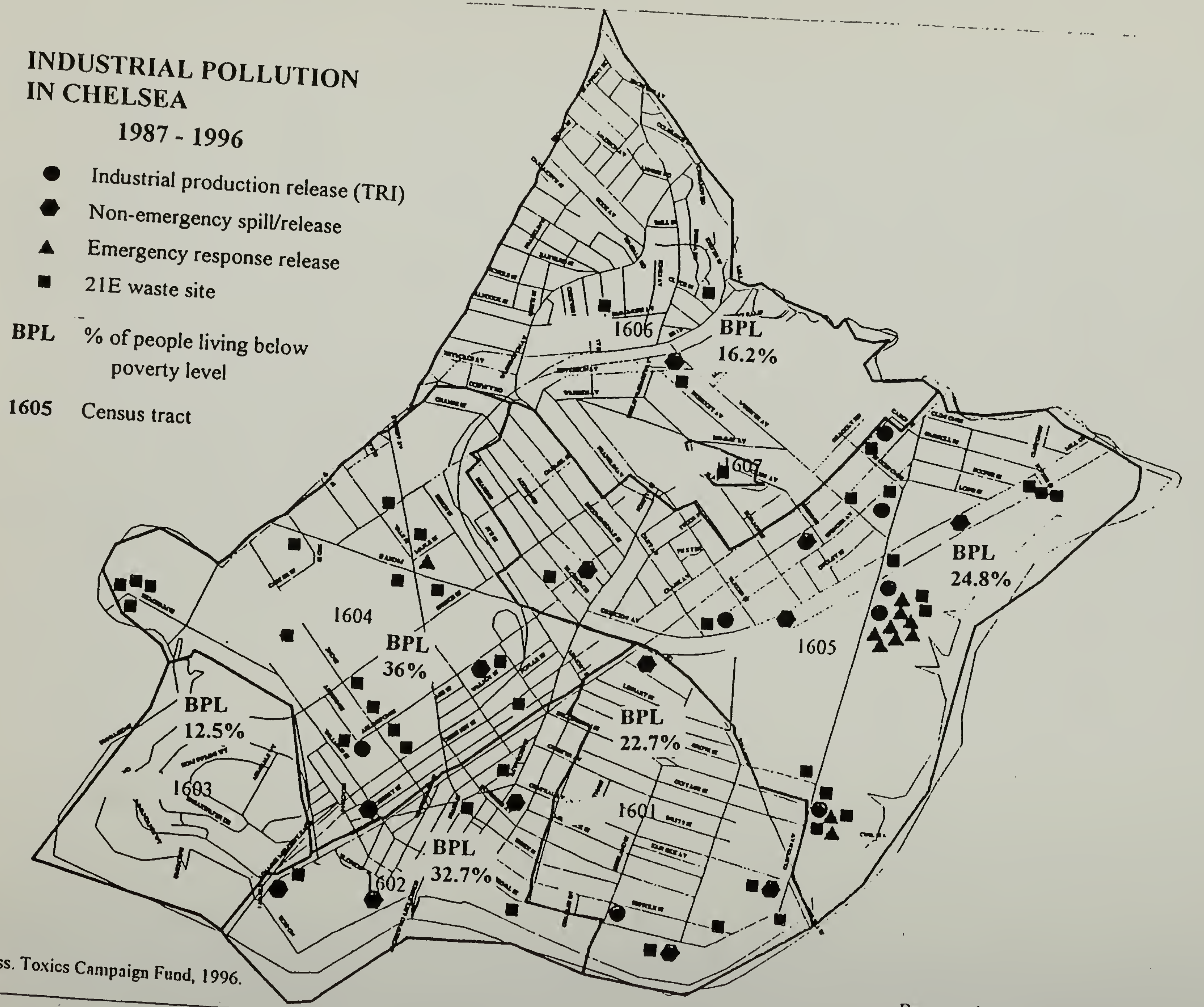
4) The companies releasing toxic chemicals into the environment need to be tracked further. For example, whatever happened to Emtex, Inc., which was once (up to 1992) the biggest releaser of toxic chemicals into the environment in Chelsea. Emtex is no longer reporting. Did the company move? Better tracking is critical. The City of Chelsea should help track these companies and provide that information to residents on a yearly basis.

5) There needs to be a closer examination of the proximity of current residential neighborhoods and schools to industrial environmental hazards.

For further information, contact:

Thomas Estabrook
Massachusetts Toxics Campaign Fund
(617) 666-1326 (eves.), (508) 934-3397 (days)
or write us at:
160 2nd Street
Cambridge, MA 02142

Information on waste sites and toxic releases can be obtained from:
Massachusetts Department of Environmental Protection, (617) 292-5500.
Ask for the waste site cleanup department, the air quality division, or the toxics use reduction department.



Mass. Toxics Campaign Fund, 1996.

Base map by City of Chelsea. 1995.

Table 9:

Chelsea Census Data (1990)

Census Tract	Number of Persons	% of Population	% Below Poverty	Median Family Income
1601	6,036	53.3 % White	10.4 % White	29,493
		6.3 % Black	14.9 % Black	
		7.2 % Asian	58.2 % Asian	
		41.63 % Hisp.	32.5 % Hisp.	
			22.7 % - ALL	
1602	3,823	58.4% White	25.6% White	22,772
		5.7% Black	22.7% Black	
		4.5 % Asian	39.4 % Asian	
		56.3 % Hisp.	41.2 % Hisp.	
			32.7 % - ALL	
1603	1,155	85.9 % White	11.2 % White	49,048
		4.9% Black	38.6% Black	
		4.6 % Asian	0% Asian	
		4.6 % Hisp.	22.6 % Hisp.	
			12.5 % - ALL	
1604	2,787	54.6 % White	27.9 % White	17,011
		9.2 % Black	45.5 % Black	
		1.3 % Asian	14.7 % Asian	
		62 % Hisp.	47.2 % Hisp.	
			36.0 % - ALL	
1605	7,754	72.5 % White	15.4 % White	29,675
		9.2 % Black	49.3 % Black	
		7 % Asian	50% Asian	
		19.8 % Hisp.	49.97 % Hisp.	
			24.8 % - ALL	
1606	6,903	89.3 % White	11.8 % White	36,667
		3.4 % Black	35.1 % Black	
		2.7 % Asian	47.1 % Asian	
		8.5 % Hisp.	71.4 % Hisp.	
			16.2 % - ALL	
1607	252			

Note: For % of population, the percentages add up to greater than 100% because Hispanic respondents in the census sometimes considered themselves to be both Hispanic and white.

We need a pause the like of which we've never had in Western civilization. We need to halt at watershed junctures, like this one involving the disposition of Utah's public lands, and ask not only what is fair, just and reasonable, but what is enduringly wise.

The durable wealth of "public lands" lies beyond private bounty. Our principal task should not be to create new wealth but to manage the wealth we already have and which, for a variety of reasons, we cannot perceive.

In theory, publicly owned lands are publicly managed lands. In practice, the managing public comprises two opposing forces that government must reconcile: those with a specific economic interest and those without. As politics changes in the United States, one or the other of these two factions construes itself more (or less) influential in shaping public land policy. Neither group, of course, is ever in an unassailable position of authority, but public land decisions show a clear pattern. Land of little or no perceived economic utility tends to get protected; land showing any potential for economic profit—because it may support grass or timber or may harbor minerals or water—is contested. (It is also true in an economy like ours that the imperative to develop inevitably forces a subdivision of the public land under consideration, thus ensuring that at least some land is always released for development.)

We need a pause in Western society because the decision to develop a stretch of public land can't be reconsidered, and at present, we're making these irrevocable decisions in preemptive, fearful haste. Nearly anyone who has attended a public land hearing, in which opposing sides square off over economic issues and what are quite accurately called spiritual issues, is appalled by the rudeness and contempt that often characterize testimony. A disinterested observer feels saddened and embarrassed by the witless rhetoric, the false airs and vituperative retorts, the blind allegiance of some individuals in government, in the environmental movement, in industry. Citizens who speak from their hearts instead of their wallets are too often dismissed by hearing committees as "irrational."

We are not, of course, in dire need of roads, transmission towers, dams, reservoirs, and gas pipelines. We are in dire need of courtesy. We are in dire need of a broadly intelligent conversation about human fate. We are in need of a thorough and piercing review of our plan for human economic development, a plan that at best is a hugely expensive speculation about human needs.

APPENDIX 7

Barry Lopez Article from _Testimony-Writers of the West Speak on Behalf of Utah Wilderness_ 1996

We are not debating "wilderness" here in trying to decide the fate of Utah's undeveloped public lands. The term is too restrictive. We're debating the future direction of Western civilization, and our issue could not be more serious. A brutal, pointed lesson of human history is that unhealthy civilizations die. Civilizations that are physically, spiritually, or economically corrosive fall apart. Their people wither. If we do not want to pass away as a civilization, let alone as a Western nation, we need to recast our discussion so that it is this, not "wilderness," that is at stake. We need to see what a grave decision the release of public land for development is. If our central concerns remain who "wins" in these disagreements, or what sorts of "concessions" will please the most people, twenty years from now we'll be looked upon as fools. In a moment that called for discerning intelligence, we will be seen as people who settled for a fight over control, a venal and pedestrian aspiration.

The wisest thing now, it seems to me, is to regard undeveloped lands as an asset and to protect every acre of land possible. American culture, more than any other in the world, has been shaped by the image of private exploration of public land. The opportunity to still have that experience is deeply important to our sense of hope. And what you might call the principal, what's left in the account, is down to a pittance.

If we do not take the time now to understand where the diminishment of wilderness in America is taking us, the day will soon arrive when it will not matter. We will have given up a vision of heaven to bet we're not embarked on a trip to hell. The United States is a nation of staggering wealth. We can easily afford to conserve what we've been given and to wait patiently for a wisdom that so far has eluded us, a wisdom that will enable us to convey this gift, not simply consume it.

Barry Lopez

BARRY LOPEZ
(b. 1945)

Letter 207
Elaine McGrath
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
207.1	Environmental Review Process	FAA/NEPA	...I urge either the withdrawal of the plan or its rejection as a proposal that is inconsistent with the requirements of the National Environmental Policy Act, and unresponsive to the scoping directives of the secretaries and to the concerns of the public.	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts. The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.
207.2	Environmental Review Process	FAA/NEPA	Massport's Draft EIS/EIR...has failed to respond to specific scoping directives in the Letters and Certificate issued by EPA, MEPA and DEP in 1995.	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons. At the FAA's direction, three SDEIS Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the SDEIS Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. To provide the appropriate background, the SDEIS Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Project's technical consulting team and other independent industry experts. The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.

Code	Topic 1	Topic 2	Comment	Response
207.3	Environmental Review Process	FAA/NEPA	NEPA requires agencies to take a hard look at the environmental consequences of their proposals, and to conduct a detailed and thorough analysis of alternatives and to make this information available to the public. Massport has not done this. There are fatal flaws with its analyses of impacts, alternatives and environmental justice.	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental DEIS to address specific issues identified by the FAA following input from an Panel consisting of six persons. At the FAA's direction, three Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. A total of 12 meetings were held. A total of twelve meetings were held. To provide the appropriate background, the Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Airside Project's technical consulting team and other independent industry experts.
207.4	Environmental Review Process	NEPA/MEPA	The proposal specifically fails to respond to directives intended to uncover these impacts, in the scoping letters of Secretaries Coxe and DeVillars, as well as DEP.	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental DEIS to address specific issues identified by the FAA following input from an Panel consisting of six persons. At the FAA's direction, three Panel members were appointed by the Governor of the Commonwealth of Massachusetts and three were appointed by the Mayor of the City of Boston. Under the direction of the New England Region FAA, the Panel convened in March of 2000 and then met at least monthly with a final meeting in December of 2000. Twelve meetings were held. To provide the appropriate background, the Panel was presented with an Interim Supplemental Draft EIS, the Airside Project Draft EIS/EIR, answers to key letters written by members of the public, concerned agencies and public officials responding to the Airside Project Draft EIS/EIR, and a series of 15 visual and written presentations from the Airside Project's technical consulting team and other independent industry experts. The other projects cited in this comment are not related to the Airside Improvements Project. Any impacts associated with those projects will be addressed in individual project filings, if required under NEPA and/or MEPA and also in the ESPR (formerly GEIR) process. The ongoing state ESPR process provides information to the federal and state agencies and the general public on the environmental effects of existing and future operations at Logan Airport, on the cumulative effect of airport operations, and on the planning context for individual projects at Logan Airport. The GEIR/ESPR is specifically incorporated by reference in the Airside Project Draft EIS/EIR and Supplemental DEIS/FEIR as a background document."

Code	Topic 1	Topic 2	Comment	Response
207.5	Analysis Assumptions/ Methodologies	Studies	Massport's impacts analysis understates impacts in a number of ways that have the cumulative effect of systematically minimizing Logan's impacts on the surrounding communities: • failure to account for the context and intensity of growth in airport operations, both land and air • unreliable modeling of impacts • inadequate and inaccurate monitoring of impacts and of mitigation • failure to report or take into account community feedback • persistent use of data known to be flawed, and unwillingness to correct mistakes • systematic and knowing selection of data so as to minimize the appearance of impacts.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. The purpose of the Airside Improvements Planning Project is to reduce current and projected levels of airfield congestion and delay and to enhance the safety of aircraft operations at Logan. Massport's proposed landside improvements are planned to enhance the efficiency of passenger processing, and include terminal modernization, as well as roadway, parking and service area improvements. The landside projects will not affect the design or implementation of the Airside Project, which has independent utility, nor will the Airside Project improvements affect the design or implementation of any of the landside projects. All airside and landside projects, where required, will continue to be the subject of separate comprehensive environmental analysis by project proponents in accordance with federal and state regulations. As expressed in the May 7, 1999 EOEA Certificate, Massport's ESPR (formerly GEIR) process "is expected provide a big picture cumulative impact analysis of Logan operations, impacts and mitigation. It complements the project-specific EIRs," such as this one for the Airside Improvements, "helps to focus the review process of individual EIRs, and ensures that segmented project review does not occur in the context of MEPA review at Logan." The emission inventory results show that the Airside Project, including the Centerfield Taxiway, would lead to a decrease in odor-causing hydrocarbon emissions, when compared to the No Action Alternative. This is illustrated in Table 6.4-7 and Figure 6.4-5 of the Supplemental DEIS/FEIR. The small changes in emission concentrations at Bayswater Street, East Boston, and Winthrop will meet federal standards for hydrocarbon emissions. Neither Massport nor the FAA has a program to increase passenger demand at Logan Airport. Rather, the objective of both organizations is to accommodate demand safely and efficiently. The recommended Airside Project is intended to enable Logan Airport to accommodate current and future aircraft activity with minimum delay. The construction of Runway 14/32 would significantly reduce delays associated with northwest wind conditions, but would not be expected to induce additional aircraft traffic or passenger activity at Logan Airport. There was an extensive public participation and review process during the preparation of the Airside Project Draft EIS/EIR. Public comments were received on the ENF after it was filed during the summer of 1995. In the fall of 1995, several public scoping sessions were held to provide community input to the subsequent state and federal scopes for the project. To assure that the Airside analysis was conducted with awareness and input from all concerned parties, the Massport Board established the Airside Review Committee (ARC), which consists of the Community Advisory Committee (with representatives from 24 communities surrounding Logan Airport), and 11 businesses and industry organizations. Massport also funded independent consultants for the CAC to provide them with the capacity to professionally assess the analysis and conclusions of the Airside Study. Between 1995 and 1999, Massport held 16 meetings with the ARC, an additional 15 meetings with just the CAC, and several meetings with the CAC consultants. In addition, Massport made 29 presentations to elected officials, most of whom represent Logan Airport's neighboring communities, and Massport held 45 meetings with community and business leaders, reaching an audience of more than 3,000 people. During the public comment period on the Airside Project Draft EIS/EIR, the FAA held two public hearings.

Code	Topic 1	Topic 2	Comment	Response
207.6	Noise	Stage 3 Aircraft	...Stage 3 aircraft are not appreciably quieter on landing and take-off, the noisiest operations which are the ones that affect the surrounding communities. Contrary to Massport's disingenuous assertions, Stage 3 aircraft do not and cannot reduce the noise exposure of the surrounding communities,....	Manufactured Stage 3 airplanes are definitely quieter during both takeoff and landing than are old Stage 2 airplanes that have been hushkitted to meet Stage 3 noise limits. Massport agrees that as long as hushkitted aircraft remain in the fleet, they will be perceived as the primary cause of noise.
207.7	Noise	PRAS	...the use of outdated PRAS goals to justify impacts as "community-approved". ...is misleading in the extreme.	The PRAS goals were established after community input in the 1980s. The goal of PRAS was to distribute noise equitably, based on demographic considerations. As demonstrated in the Supplemental DEIS/FEIR, there have been no significant demographic changes since the time of the establishment of the PRAS goals. An update of the PRAS goals is therefore not warranted. Furthermore, the Supplemental DEIS/FEIR also demonstrates the more equitable balance of noise impacts among communities surrounding Logan Airport that can be achieved with the Preferred Alternative as opposed to the imbalance that occurs today and would occur in the future if no action is taken.
207.8	Noise	Model	...Massport INM noise modeling has fallen short of actual impacts in several instances.	Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix E of the *Logan Airport 1996 Annual Update).* In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft – a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the *Logan Airport 1999 Environmental Planning and Status Report*). Massport continues to investigate possible causes for remaining differences (such as from hill effects) but believes the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure.

Code	Topic 1	Topic 2	Comment	Response
207.9	Noise	Model	Massport does not include in its proposal the persistent community protests, the noise complaint data from its hotline, or present in a coherent way its own track record of inaccurate noise measurement. Even protests from local, state and federal representatives are not used as a check for the numbers that Massport wants to use....	Massport reports noise complaints annually in its ESPR (formerly GEIR) and each Annual Update. This is published and distributed widely and presented to the Massachusetts Secretary of Environmental Affairs who reviews the documents under MEPA requirements. Letters and comments specific to this project and the responses to those comments are published in Volumes 5-10 of this Supplemental DEIS/FEIR.
207.10	Noise	Model	...the waterfront area, including Beacon Street, is not on the map under the 14/32 proposal...This is so, even though Massport uses numbers of several thousands of people in Chelsea in the 65dB, up to the 75dB range, in its hypothetical 1993 baseline for the city.	Refer to the updated graphics in Chapters 4, 5 and 6 of this Supplemental DEIS/FEIR. Graphics have been updated, supplemented and corrected.
207.11	Analysis Assumptions/ Methodologies	Studies	There are still more sources of bad statistics and understatement. One is the omission of significant data through failure to coordinate with other agencies with necessary expertise, such as the Department of Public Health, the State Transportation Department., including public transportation gurus and highway departments, or through failure to report available information.	The model and methods used to develop these data were based on EPA- and DEP-approved guidelines and show that the NAAQS will not be violated.
207.12	Air Quality	Monitoring	The 1 air monitor in Chelsea from Department of Public Health is at Soldier's Home, as far away as you can get from the air and ground traffic to the airport. There's a concentrated impact area [around truck routes]. It's not monitored. These impacts are not accounted for in the proposal, and they will only get worse if Logan's operations are allowed to increase.	The DEP monitor at Soldier's Home is the closest station to Logan Airport that measures ozone. The closest DEP monitoring site to Logan Airport is at Bremen Street. Several pollutants are monitored at this site: CO, NO_2, SO_2, and PM_{10}. Background concentrations were obtained primarily from the Bremen Street site. Massport also has several NO_2 monitoring stations in the Chelsea area.
207.13	Public Health	Effects	...Massport ...[should fund a DPH] epidemiology study...of health impacts in the surrounding communities.	Public health issues are discussed in Section 6.8 of the Supplemental DEIS/FEIR. Massport has provided the City of Boston and public health agencies with air quality and emissions data. In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 *Report to the Mayor, Health of Boston* prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the *Soot Deposition Study* with public health agencies and is cooperating with the Harvard School of Public Health on the *South Boston Particle Source Apportionment Study.*
207.14	Noise	Soundproofing	Massport does not reflect these complaints [regarding soundproofing] in its analysis of mitigation. The complaints mean that even where Massport has tired to mitigate its impacts, it hasn't been able to. Nor does Massport identify any measures to assess whether the soundproofing works.....	Logan Airport has one of the most comprehensive and progressive sound insulation programs of any airport in the country. It was initiated in 1980 before any airport began receiving federal funding to soundproof homes under FAR Part 150. It is the only program in the country to offer residents extra sound insulation treatment in a "room of preference" chosen by the homeowner and it is the only program in the country attempting to receive FAA approval to expand the area of eligibility by accounting for hill effects. In addition, as of the 1999–2000 construction season, FAA grants covering 80 percent of the cost of sound insulation (paid for by airline ticket taxes), combined with funds provided by Massport through Passenger Facility Charges and landing fees, had fully funded the sound insulation of all eligible dwelling units in Massport's current sound insulation program. Despite this accomplishment, Massport continues to seek means of expanding its sound insulation program exclusive of FAA's decision on this Supplemental DEIS/FEIR. If the FAA approves the Preferred Alternative, Massport is committed to expanding the program to include all additionally eligible residences.

Code	Topic 1	Topic 2	Comment	Response
207.15	Noise	Model	Massport has underestimated the number of people who live with 60dB, 70 dB, 80-past 100dB routinely; the air and noise pollution its total operations produce; the social, economic, health and esthetic damage it does. By not verifying its models, and failing to take into account information from residents, Massport has submitted an impacts analysis that is statistical nonsense.	Tables 6.2-4 and 6.2-5 show the noise exposed population for the 29M Low and 37.5M High Fleet scenarios respectively. Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix E of the *Logan Airport 1996 Annual Update).* In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft -- a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the *Logan Airport 1999 Environmental Planning and Status Report*). Massport continues to investigate possible causes for remaining differences (such as from hill effects) but believes the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure. Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix E of the *Logan Airport 1996 Annual Update).*

Code	Topic 1	Topic 2	Comment	Response
207.16	Environmental Review Process	FAA/NEPA, MEPA	...Massport ...[has failed] to propose meaningful, reasonable alternatives and to conduct a thorough study and detailed description of them...To allow Massport to conduct this analysis without proposing a significant alternative to the growth of the airport is to make a mockery of NEPA.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's *Logan Capacity Enhancement Plan* (October 1992); the *Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study* (December 1993); the *Logan Final GEIR* (July 1993); and the *Logan Airside Improvements Feasibility Study, Phase 1 Report*, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its *Boston Logan International Airport Capacity Enhancement Plan*. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the *Logan Airside Feasibility Study*, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.
207.17	Alternatives	Preferred Alternatives	Whatever Massport thinks the capacity should be, community residents from at least 28 cities and towns have been vociferous in their many meetings with Massport and the FAA, in their noise complaints, and through their local, state and federal representatives, that the human carrying capacity in this area has been exceeded-a critical point left out of Massport's analysis.	Comment noted.
207.18	Alternatives	Other Non-Construction alternatives	The environmental secretaries directed Massport to explore ways of accomplishing its goals without airfield improvements...and to consider operations restrictions as a mitigation measure...These directives are ignored or minimized in the alternatives analysis.	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.
207.19	Alternatives	Other Non-Construction Alternatives	A meaningful alternative that would accommodate travelers and communities would be to reassess the effective capacity of Logan with the goal of shifting traffic now, and creating a well-functioning, right-size airport in the context of livable communities...Airport capacities have been modified, and there is no reason those modification cannot be downward, in line with public health and safety; business pressure and the convenience of the traveling public have to be secondary concerns to safety and health.	The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives. Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 of the Supplemental DEIS/FEIR indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
207.20	Alternatives	Reduced Approach Minima	Along the flight paths, planes fly over a major power plant, an LNG facility, several oil tank farms, the Tobin Bridge and 2 other bridges that are major thoroughfares into East Boston and downtown Boston, and hills. Whatever safety advantages there are to flying on IFR are cancelled out by the increased risks of flying over this terrain without a visual check.	The primary benefit of Runway 14/32 is to reduce delays during VFR conditions when strong northwesterly winds current limit Logan Airport to a single arrival stream. During IFR conditions, landings on Runway 32 would be limited by obstacle clearance—ship masts in the harbor and buildings in Boston. No approach lighting pier is planned for Runway 32 since it could not improve the landing minimums below 400 to 500 feet. Moreover, under IFR conditions the capacity of the Runway 33L/32/27 configuration would be compromised by the need for diverging missed approach and departure paths and the crossing of both Runway 32 and Runway 33L by Runway 27 departures.
207.21	Alternatives	Reduced Approach Minima	The lack of awareness and respect for the surrounding communities that ...[reduced minimums] reflects is symptomatic of the myopia of Logan's planning. I urge the FAA to withdraw this proposal or the reviewing agencies to reject it as inadequate in its analysis.	The agreement between the City of Boston, the FAA and Massport stipulates that any modification of the existing minimums requires completion of an EIS/EIR, even though the setting of minimums is otherwise categorically excluded from the EIS/EIR process. The reduced minimums will, in fact, enhance safety by providing precision guidance to a point closer to touchdown and reducing reliance on Runway 4R under poor weather conditions, when winds may favor use of an alternate runway.
207.22	Environmental Justice	Impacts	Massport's Environmental Justice (EJ) analysis is also flawed. Both within the specific poverty and race guidelines of the Presidential Order, and a broader analysis based on the principle of proportionality, Massport's proposal fails the test of environmental justice.	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.

Letter 207: Elaine McGrath
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
207.23	Environmental Justice	Impacts	Because...analysis is based on noise contour maps, its numbers are understated and unreliable. It is impossible to know from its analysis how many people who are minorities or below the poverty line (BPL) are disproportionately affected by its operations.	Low income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. The data presented are based on the most recently available census data (1990) using Geographic Information System (GIS) technology to analyze impacts at the most detailed level possible. Refer to Sections 6.8.3 and 6.8.5 of the Supplemental DEIS/FEIR for a discussion of the analytical methodology and results, respectively
207.24	Environmental Justice	Demographic Data	There is another EJ issue that Massport fails to acknowledge. The principle of EJ is based on the notion of proportionality and the reality that certain populations are disproportionately affected by polluting activities.	The environmental justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. Refer to Section 6.2 and Section 6.8 of the Supplemental DEIS/FEIR, respectively, for additional information on noise impacts and environmental justice.
207.25	Public Health	Effects	Massport and the FAA are "committed" to maximizing the use of the runways that currently blitz Chelsea: 15R/33L, for late night flights in particular, between midnite [sic] and 6 a.m. ...and to run the greatest number of additional flights: 22,000, overhead. To allow Logan to expand its operations, air and ground, through communities like Chelsea, is unconscionable. In environmental terms, it is to institutionalize a sacrifice area. No community should have to endure this.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-8 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
207.26	Cumulative impacts	Delay	The root problem is that, even operating at an annual average over all conditions of 115 operations per hour, Logan is operating beyond its effective capacity. For some time, it has been operating well beyond the carrying capacity of the communities whose residents eat its impacts.	Comment noted.
207.27	Environmental Review Process	Public Process	Among the information and initiatives that are needed are: coordination and funding of agencies to provide data on air and noise pollution and epidemiology such as the Department of Public Health and the state transportation department, especially the regional and highway departments; adequate and accurate monitoring of air and noise pollution in areas that reflect those impacts; consideration of improvements such as a ban on night flights and rerouting of passenger and truck traffic away form residential areas; a collaborative process that gives the communities a real influence over airport operations that affect them, and that reflects real alternatives to Logan growth as part of a regional transportation policy; and ways to ensure that there is an independent, competent assessment of Logan's impacts.	Public health issues are discussed in Section 6.8 of the Supplemental DEIS/FEIR. Massport has provided the City of Boston and public health agencies with air quality and emissions data. In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 *Report to the Mayor, Health of Boston* prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the *Soot Deposition Study* with public health agencies and is cooperating with the Harvard School of Public Health on the *South Boston Particle Source Apportionment Study.*

April 19, 1999

Massachusetts Environmental Protection Agency
Robert A. Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

Mr Durand:

I would like to take this opportunity to point out that the Draft EIS/EIR for runway 14/32 and the Centerfield Taxiway is inadequate and request that it be judged so for the following reasons:

1. Outdated studies and figures (potentially misleading) were used by Massport
2. FAA modeling guidelines were not adhered to by Massport 208.1
3. There were a lack of alternative studies in the report, such as:
   Better use of regional airports such as Hanscom, et al
   Study for a Second Airport
   Regional Rail Transportation Planning

As a resident of the greater Boston community, I ask that you consider social justice and fairness as related to the environmental effects in the short and long term of this proposal for the good of all residents and visitors. 208.2

Logan Airport is the only inner-city airport, that is looking to expand, without a sister regional option for overload & future capacity; the regional area is the only one that I know of in this country without a second major airport and a regional plan. As a frequent traveler I expect that when I travel I will have a commute in the range of one hour when I am traveling from the airport to the downtown of a major city, I belive that travelers will still come to Boston if they have a fourty minute drive to/from the Worcester area. Why should we continue to support this antiquated airport location at the expense of our overall environment, taxing our communities and infrastructure only to see a future with limitations at Logan Airport? 208.3

With it's unique and challenging location, Logan Airport should be utilized to its fullest extent with the current configuration; future growth and delay scenarios should be resolved through a regionalized planning effort. All that are affected should have proper time to review the facts and be given a chance to vote on this matter. 208.4

Massport is a public agency, as a member of the public we are all "stockholders" in this corporation. Let it be a matter of public record that this "stockholder" believes that Massport has not followed the rules, will not follow the rules and is acting in it's own interest, not the interest in which it serves

If you have any questions, please feel free to call me at 617-889-1400.

Thank you for your consideration,

Ron D. Morgese
65 Breakwater Drive
Chelsea, Ma 02150

Letter 208
Robert D. Morgese
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
208.1	Environmental Review Process	FAA/NEPA, MEPA	... Draft EIS/EIR for Runway 14/32 and the Centerfield Taxiway is inadequate and request that it be judged so for the following reasons: 1. Outdated studies and figures (potentially misleading) were used by Massport 2. FAA modeling guidelines were not adhered to by Massport 3. There were a lack of alternative studies in the report, such as: better use of regional airports such as Hanscom, et. al; Study for a Second Airport; Regional Rail Transportation Planning	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport. Consistent with the request made by the EOEA in its Certificate on the Draft EIR, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and provide context to the delay problem at Logan Airport. The High and Low Fleet scenarios for 37.5 and 45 million passengers represent a range of possible future activity—both levels and fleet mix—at Logan Airport. So-called New Large Aircraft (NLA) carrying up to 1,000 passengers are still just in the discussion phase. No manufacturer has undertaken serious development of such aircraft yet, which would be a multi-year process. These aircraft would probably require modifications to existing airport jetways and apron areas along with increases in taxiway width and turning area. Their use would be limited to extremely high-density markets, and it is not likely that Boston would be among these. In fact, the number of "jumbo jets" serving Logan Airport has declined in recent years. Consequently, the NLA was not included in the Future Fleet scenarios. DELAYSIM is a unique model that simulates how Air Traffic Control uses an airport's runways over time based on actual weather patterns and expected demand conditions. The FAA does not have an equivalent model, but uses a simplified (and less precise) procedure of weighting delays based on percentage of time different weather conditions exist. As part of the Airside EIS/EIR process, Massport explored several regional alternatives to determine the extent to which passenger diversion to other airports and travel modes or the elimination of demand through advances in telecommunications technology can solve Logan Airport's current and future delay problems. These alternatives have potential to absorb a portion of the growing demand for Logan Airport air services, but they will not provide sufficient relief to eliminate the need for airside projects. Chapter 2 of the Supplemental DEIS/FEIR includes a complete discussion of the regional transportation planning context.

Code	Topic 1	Topic 2	Comment	Response
208.2	Environmental Justice	Impacts	...I ask that you consider social justice and fairness as related to the environmental effects in the short and long term of this proposal for the good of all residents and visitors.	The environmental justice analysis found no disproportionately high and adverse impacts to low-income and minority populations from direct project impacts. Refer to Section 6.2 and Section 6.8 of the Supplemental DEIS/FEIR, respectively, for additional information on noise impacts and environmental justice.
208.3	Purpose and Need	Airfield Capacity	... Why should we continue to support this antiquated airport location at the expense of our overall environment, taxing our communities and infrastructure only to see a future with limitations at Logan Airport?	A second major airport is not a solution to the current delay and congestion problems at Logan Airport. The Proposed Project to reduce delay and enhance safety at Logan Airport must be implemented in the near term to address current and future operating conditions.
208.4	Regional Transportation	Regional Airports	...future growth and delay scenarios should be resolved through a regionalized planning effort.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.

Bcc: Arthur Pugsley@MEPA@EOEA
From: "moses" <moses@tiac.net>
Subject: runway 14/32
te: Tuesday, April 13, 1999 5:57:22 EDT
tach:
ertify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

LETTER 209

Material here was first printed as a letter to the editor in the Chelsea Record

Has Peter Blute told three lies?

Peter Blute has told the public and the politicians several things about runway 14/32.

At least three of them seem to be lies.

<bold>Only a new runway will be able to take care of the increasing delays at Logan airport:

ld>

The FAA lists the delay per 1000 operations at Logan on its web pages under Airport Data.

In 1992 the delay rate was less than four percent (3.923%).

By 1996 the delay rate was about two and one half percent (2.519%). Peter Blute is new to his job.

A reasonable question would be ...

What did Peter Blute do that made the delay rate go back up after 1996 ?? 209.1

Another would be ... Why has he not given the 97, and 98 rates to the FAA for posting on Its web site?? 209.2

Another would be ... Why are we worried about a delay rate less than 4%?? 209.3

the fact that Massport did not use established FAA methods of determining delays is proof of a disregard for the

truth and the general public.

<bold>The new runway will be uni-directional:

</bold>

The FAA web site states that the plan is to construct a new runway 32

<bold>AND</bold> to extend runways 15r/331 and runway 9.

There are three runways involved.

And the FAA would have the final say about directions for takeoff and landing.

A reasonable question would be ... How can Peter Blute promise something that he can not lawfully deliver? 209.4

Before construction can begin something must be done about the migratory birds that nest at Logan.

An article in the Herald disclosed that Massport is prepared to spend a quarter of a million dollars to move the birds from Logan to Otis Air Force Base. 209.5

<bold>Massport claimed it had the cooperation of the Mass Audubon Society for this move.

</bold>

A spokesperson at the office of Mass Audubon disclaimed any such agreement.

A reasonable question would be ... How can the public trust anything that Massport says?

for this, and any number of reasons as contained in the Draft Environmental Impact Analysis by:

Peter Alachi, MS, Biology

<bold>the Draft by Massport must be rejected out of hand!!!</bold>

Letter 209
R. E. Moses
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
209.1	Purpose and Need	Delay	...What did...[Massport] do that made the delay rate go back up after 1996?	Refer to Section 1.4 and Appendix C of this Supplemental DEIS/FEIR contains a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports. The delay situation is not at equilibrium. FAA Opsnet delays at Logan Airport peaked in 1993, declined for two years and are rising again. Arrival delays, which would be directly affected by Runway 14/32, have risen steadily since 1994. In fact, Logan Airport is the second most delayed airport in the nation for arrivals.
209.2	Purpose and Need	Delay	...Why has ...[Massport] not given the 97, and 98 [delay] rates to the FAA for posting on its website?	The FAA delay statistics on the FAA web site are collected by the FAA and not by Massport. Refer to Section 1.4 and Appendix C of the Supplemental DEIS/FEIR for a discussion of the FAA and DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports.
209.3	Purpose and Need	Delay	...Why are we worried about a delay rate less than 4%?	Refer to response to Comment 209.1.
209.4	Alternatives	Runway 14/32	...How can ...[Massport] promise [to control the directions of takeoffs and landings]?	The Runway 14/32 concept under review in this Supplemental DEIS/FEIR allows unidirectional operations only (*i.e.*, all aircraft arrivals would occur over Boston Harbor to the Runway 32 approach and all departures would initiate from the Runway 14 heading out over Boston Harbor). State approval under MEPA and federal approval under NEPA will allow Runway 14/32 to proceed only on a basis consistent with the stated unidirectional limitations. Consistent with any such approvals, Massport will light and stripe Runway 14/32 to accommodate unidirectional operations only. Furthermore, the location of proposed Runway 14/32 involves physical limitations that reinforce the unidirectional requirements of that improvement concept. The Hyatt Hotel and Conference Center, which is 174 feet high, is within 1,300 feet of the Runway 14. The location of the Hyatt Hotel and Conference Center invades applicable FAA approach surface glide slope requirements, thereby precluding arrivals from the west to the Runway 14. Another factor limiting westerly operations on Runway 14/32 is the lack of available facilities to allow aircraft to taxi to the Runway 32. The unidirectional limitations of Runway 14/32 allow maximum use of over-water operations and thereby limit operational impacts over residential areas. To strictly reinforce these important environmental benefits, Massport has designated the intended unidirectional limitation on Runway 14/32 as a mitigation measure. Refer to Section 8.5 of the Supplemental DEIS/FEIR regarding enforcement of unidirectionality of Runway 14/32.

Code	Topic 1	Topic 2	Comment	Response
209.5	Ecosystems	Rare Species	Before construction can begin something must be done about the migratory birds that nest at Logan. An article in the Herald disclosed that Massport is prepared to spend a quarter of a million dollars to move the birds from Logan to Otis Air Force Base. Massport claimed it had the cooperation of the Mass Audubon Society for this move. A spokesperson at Mass Audubon disclaimed any such agreement.	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport from construction of the Centerfield Taxiway. The plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far exceeding the ±40 acres to be lost at Logan Airport. In the event that such a program at Camp Edwards is not available, an appropriate alternative program acceptable to the NHESP will be developed and implemented. Additional details of the Upland Sandpiper mitigation plan are presented in Section 6.5 of the Supplemental DEIS/FEIR.

LETTER 210

Bcc: Arthur Pugsley@MEPA@EOEA
rom: "moses" <moses@tiac.net>
ıbject: Runway 14/32
te: Tuesday, April 20, 1999 11:27:39 EDT
Attach:
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

On 4/20/99 the Boston Herald Reported complaints of Airline passengers. Airport delays were not on the list.
Passengers complain about the way they are treated by the Airline.

Massports delay statistics are not the point for airline travelers.

1. Massport claims that last year there were over 120,000 hours of delay at Logan.
2. There are less than 9000 hours of real time in a year.
3. It is obvious that they are counting delays more than once. 210.1
4. This is not the accepted method of delay counting according to the Federal Aviation Agency.
5. Since Massport has lied with statistics in its EIS Draft the draft must be rejected out of hand.

Letter 210
R. E. Moses
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
210.1	Delay	Model	1. Massport claims that last year there were over 120,000 hours of delay at Logan. 2. There are less than 9,000 hours of real time in a year. 3. It is obvious that they are counting delays more than once. 4. This is not the accepted method of delay counting according to the Federal Aviation Agency. 5. Since Massport has lied with statistics in its EIS Draft, the Draft must be rejected out of hand.	The results for 1998 presented in the Airside Project Draft EIS/EIR were based on preliminary data. The Supplemental DEIS/FEIR contains updated information for 1998, including total annual runway delays of 129,500 hours. These are cumulative delays for all 513,800 flights, or an average of 15.1 minutes per flight. The Supplemental DEIS/FEIR contains a discussion on the estimation and modeling of flight delays, including a description of FAA and DOT delay measures and their limitations. Estimated delay reduction is one of the primary factors used by the FAA for approving aviation investment projects.

40 Beacon Street
Chelsea, MA 02150
April 21, 1999

LETTER 211

Secretary of Environmental Affairs
Attention MEPA Office
Mr. Arthur Pugsley-EOAO No. 10458
100 Cambridge Street
Boston, MA 02202

Dear Mr Pugsley:

This was a video taped by a local resident,Elaine McGrath of Beacon St.,Chelsea, to demonstrate to local officials some of the crippling effects of truck traffic leaving the Tobin Bridge, exiting on to narrow Chelsea streets because they are considered Truck Routes by Mass Highway. This video was shown on Chelsea Community Cable April 1998 and also filmed that month. (April is a'slow' truck traffic time since few dump trucks going to the salt pile and fewer heating fuel trucks going to the many tanks in Chelsea, but the Air Cargo trucks know no slow season.) It waw purposely filmed when planes weren/t over head because they are the only noise that is capable of drowning out the Air Cargo truck noise, but a few planes directly overhead do slip in halfway through the film. As a result of tremendous effort by our City Councilors and local residents, there may be a late night ban on truck traffic on some of these roads, but we have been told that trucks will always use this ramp because it is a route to the Airport.

Vol.1,ES-27: "Truck traffic associated with the desired airside improvements...average about 129 round-trip truck trips daily. Trucks will be prohibited from using local streets and thus will not impact local residential streets in communities surrounding the airport. Construction vehicles will be required to use state highways and/or main airport roadways which are designated truck routes."

a) Massport needs to let us know how 129 ("average,about") truck trips was chosen. As you may know from recent hearings/readings Massport has difficulty using accurate numbers for what has already occured, let alone giving us a number as a projection. Massport is not good in giving an accurate accounting. Their truck numbers are a very important issue to us. In the EIS 58 to 500+/day truck trips are projected,which is it? Is is in addition to? 211.1

b) Many streets in surrounding airport communities are designated truck routes, done years ago by major state agencies, Iwould hazard a guess, working together on occasion to speed up truck traffic to the Airport. I have seen how many years it takes to even limit a few trucks for a few hours on one of these streets. (The cost of residents hours working to limit Logan's impacts on their lives is also not given in the EIS,nor considered a problem by the writers of the EIS)

c) Construction vehicles will be using the roads seen in this film which Massport uses presently for their airport traffic, air cargo, and Big Dig dump trucks (Massport told us no Big Dig trucks on this route, the drivers drinking coffee in 'Christies' told us otherwise...we just thought someone was digging a very bid garden out in Boston)
Chelsea will be the city for Logan's trucks, traffic, noise and air pollution, dented cars, accidents.

"vehicles will be required..." By Whom? Who has this authority or a desire to use it? Who will enforce it? Massport Police? Local police; shortstaffed, overworked-out there stopping trucks? Who? Who will keep these trucks out of residential neighborhoods? (which the neighborhood on the film is so called residential/commercial)

So here's the popcorn, sit back and watch-this is Chelsea Waterfront not at its best but getting there-brick rowhouses built 1860's, formally filled with seafaring folk now populated with a diverse population of many color, creeds, age, land of origin-you name it and we've got it-and it works! But unfortunately, it is not mentioned in the EIS when it faces the Environmental Justice analysis because Chelsea was taken off the Noise Contour Map because of inaccurate monitoring (noted in many reports on your desk I'm sure) by Massport. Chelsea should be a hotbed of Environmental Justice concerns and it is being addressed with the many other polluting businesses in Chelsea but we can't get Chelsea's minorities and low-income earners even in the EIS. Why?

Thank you for your time and hard work on this issue-it's really life and death to us here in these towns-we don't want to become a ghost town,polluted unliveable so that Massport can take more land for its parking lots and air cargo hangers.

Respectfully,

Mary Jane Quinn

Video +
letter
4-22-

M. J. Quinn
40 Beacon St
Chelsea MA
#10458

Traffic Count

Organized by Chelsea Green Space and Recreation Committee
Conducted by Environmental Crew
July 24, 1997
2p.m. - 3:30 p.m.

Intersections of
Broadway/ Beacon / Williams, CHELSEA, MA

Totals

Cars	~~Diesel~~ Trucks	Buses
1144	413	18
Total	1575	

for 1½
in July

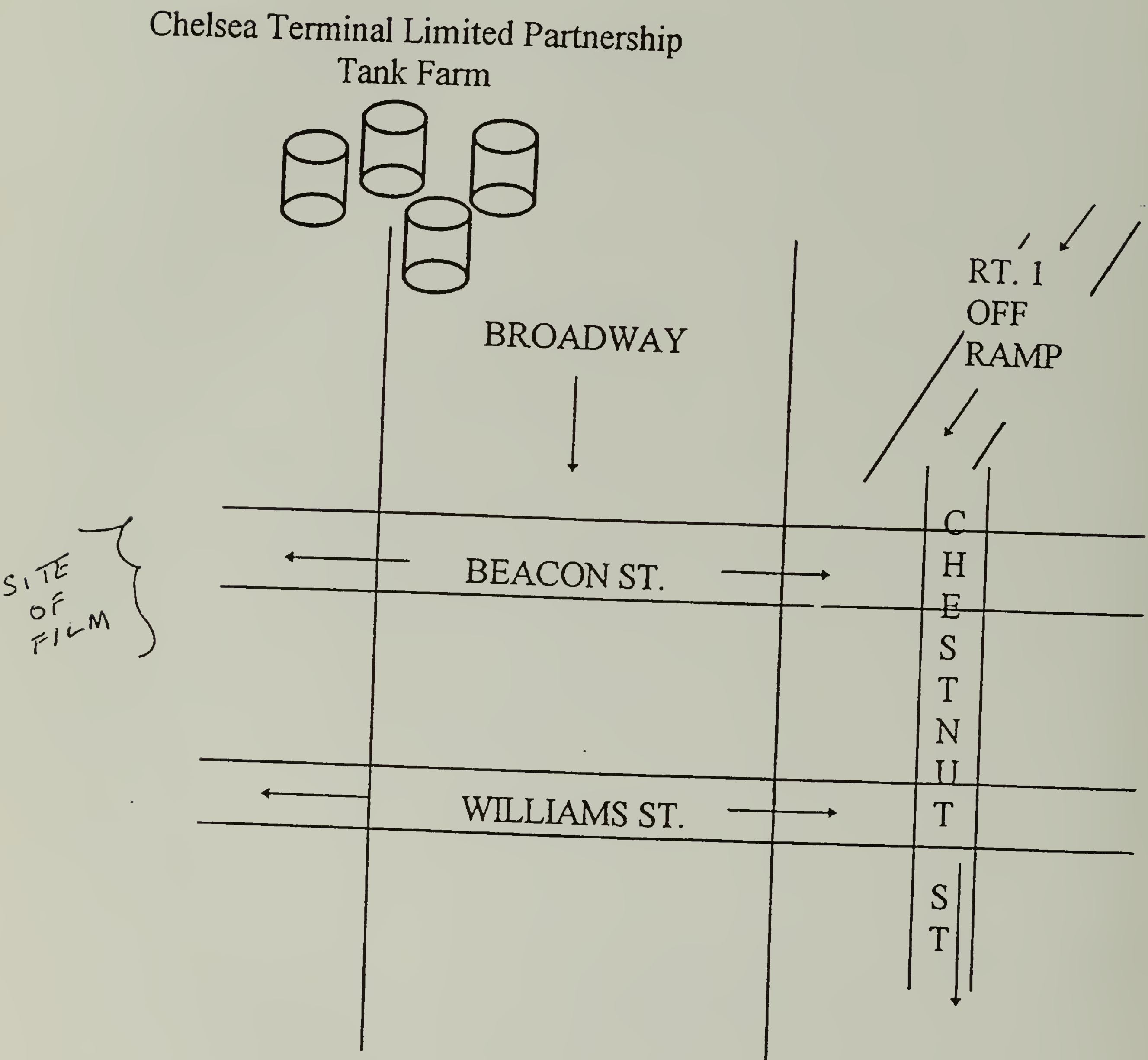
(in the wint
months —
↑ Dump truc
+ Diesel
↓
Tank
Farm

su
pi

3.6
Tobin Bridge 1/98 916,000
30-33,000/day work days ONE WAY

study for MITC 1/16 150,000 day

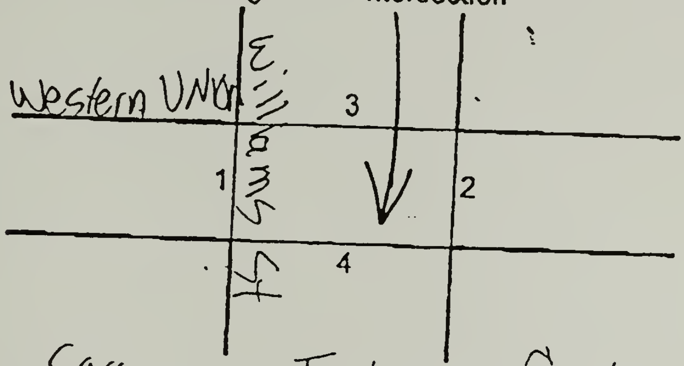
Traffic Count
Organized by Chelsea Green Space and Recreation Committee
Conducted by The Environmental Crew
July 24, 1997
2p.m. - 3:30 p.m.



Traffic or Pedestrian Counting Chart

Name: Jamie
Date:
Start Time 2:00 pm **End Time:** 3:15
Streets: Williams St.

Diagram of Intersection



No Buses

	Cars	Trucks	Cars	Cars cont.
Time Period	**1**	**2**	**3**	**4**
2:00-2:15				
2:15-2:30				
2:30-2:40				
2:40-2:50				
2:50-3:00				
3:00-3:05				
3:05-3:10				
3:10-3:15				

158 Cars 42 trucks
107 Cars 20T
115 C 18T
105 C 26T
93 C 30T
41 C 20T
69 C 17T
58 C 10T

Total Cars 746

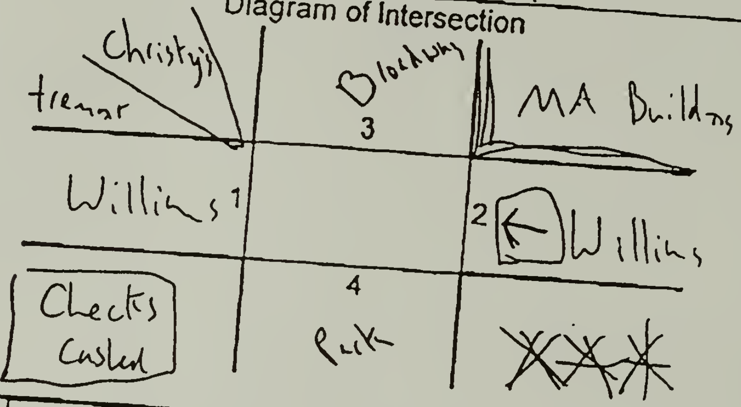
Created by Penn Loh, ACE (617 442-3343 x24) 7/22/97

183 TRUCKS Total
929 TTL Vehicles

Traffic or Pedestrian Counting Chart

Name: Chau Hoang
Date: 7/24/97
Start Time 2:00 **End Time:** 4:00 p.m.
Streets: Williams St.

Diagram of Intersection



Time Period	1 Car	2 truck	bus 3	4
2:00	74	35	1 1	
2:15	116	17	11 2	
2:30	78	16	1 1	
2:45	60	28		
3:00	104	40		
3:15	115	27		

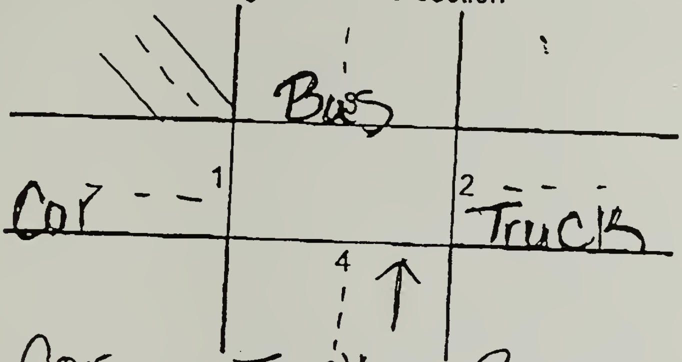
Created by Penn Loh, ACE (617 442-3343 x24) 7/22/97

547C 165T 4b

Traffic or Pedestrian Counting Chart

Name: Dolly Ann Pettie — jr.
Date: 7/24/97
Start Time
End Time: 4:00 pm
Streets: Park St tour Broadway St

Diagram of Intersection



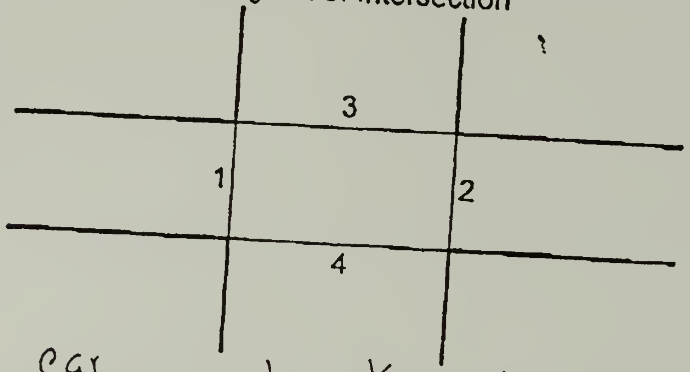
Time Period	1 Car	2 Truck	3 Bus	4
2:00/2:15	33	7		
2:15/2:30	40	5		
2:30/2:45	27	7		
2:45/3:00	45	1		
3:00/3:15	67	8		
3:15/3:30	52	3		
	264	31		

Created by Penn Loh, ACE (617 442-3343 x24) 7/22/97

Traffic or Pedestrian Counting Chart

Name:
Date:
Start Time **End Time:**
Streets:

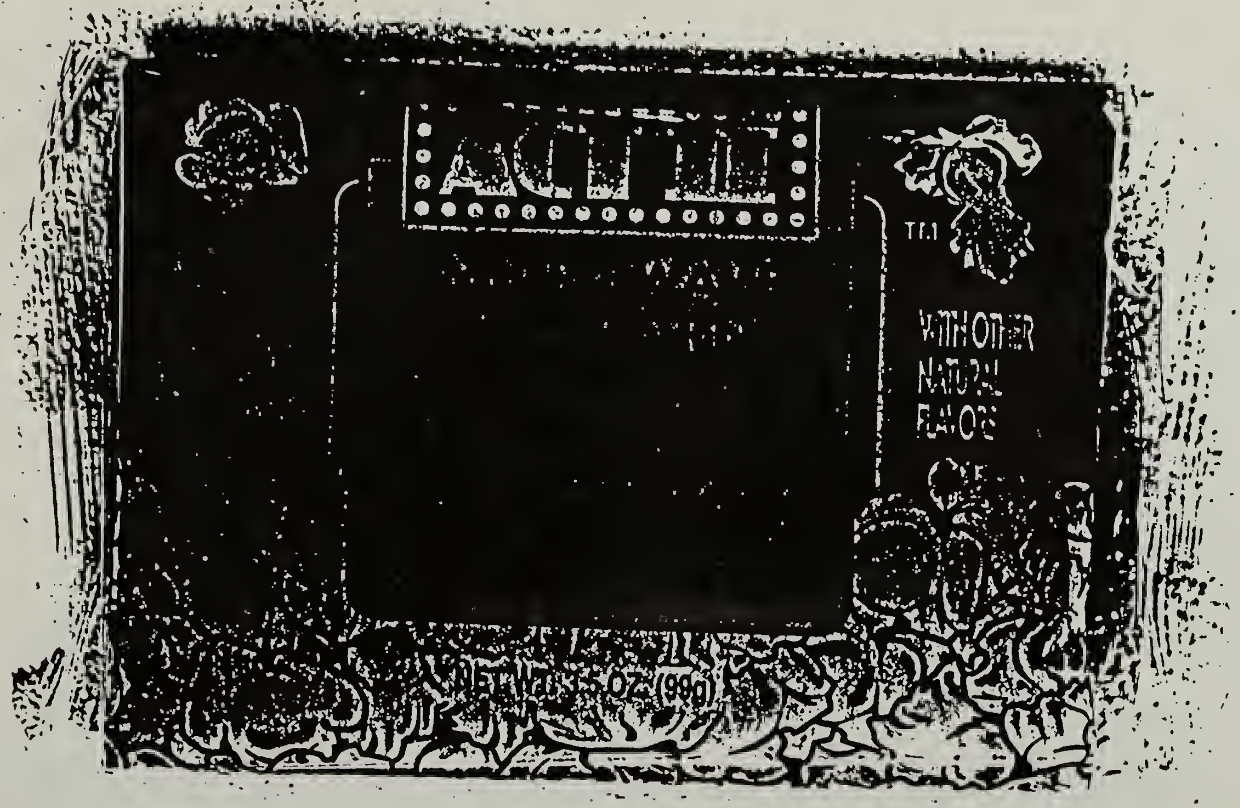
Diagram of Intersection

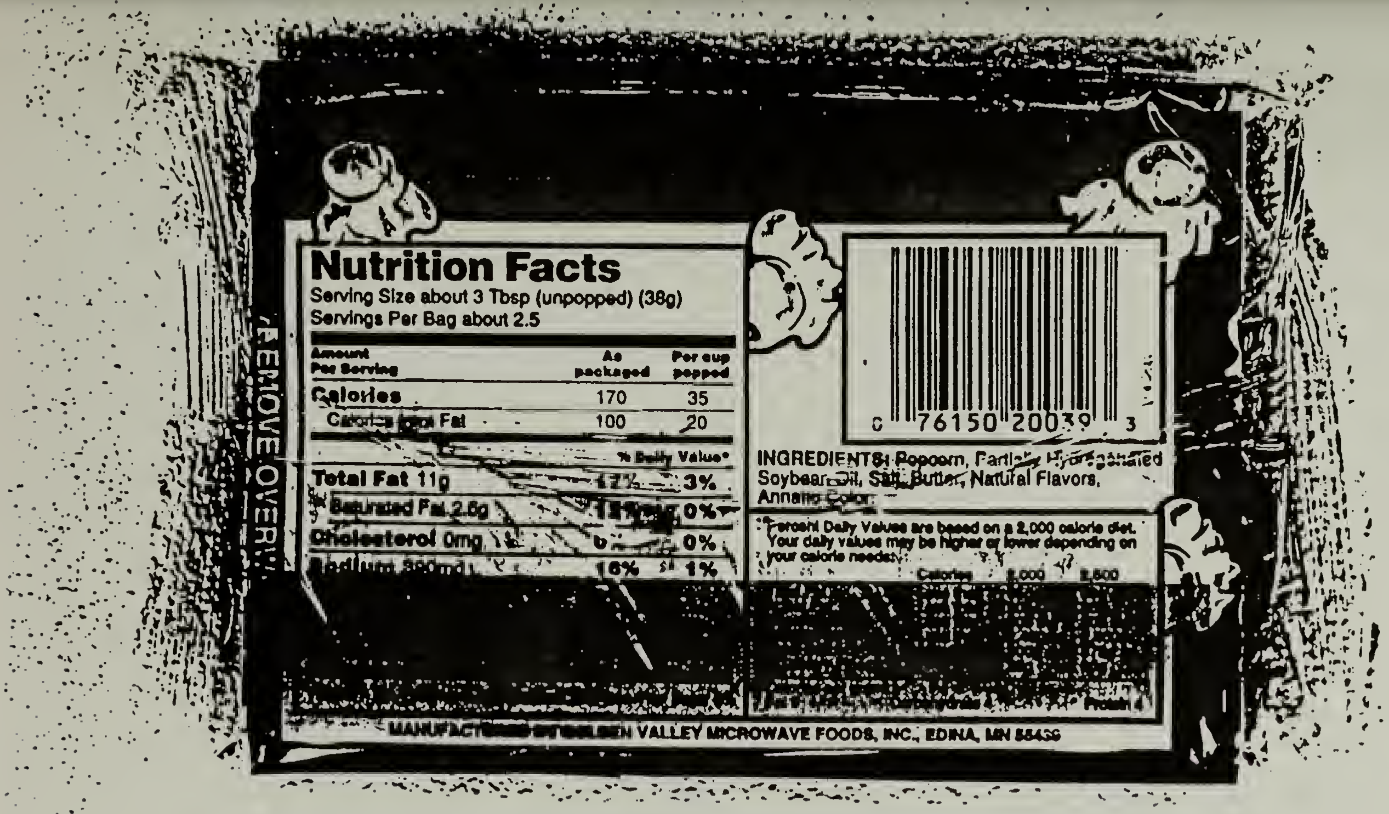


Broadway toward park

Time Period	car (29) 1	trunk 2	bus 3	4
2:00-2:15	(29)	卌 || (7)	1 (1)	
2:15-2:30	(40)	| (1)	||| (3)	
2:30-3:00 (20)		(15)	卌 (5)	
3:00-3:30	[illegible]	(11)	卌 (5)	
	134 cars	34 trunk	14 bus	total-182

Created by Penn Loh, ACE (617 442-3343 x24) 7/22/97


ACT II
TM
WITH OTHER
NATURAL
FLAVORS
NET WT 3.5 OZ (99g)



REMOVE OVERW

Nutrition Facts

Serving Size about 3 Tbsp (unpopped) (38g)
Servings Per Bag about 2.5

Amount Per Serving	As packaged	Per cup popped
Calories	170	35
Calories from Fat	100	20
	% Daily Value*	
Total Fat 11g	17%	3%
Saturated Fat 2.5g	[illegible]	0%
Cholesterol 0mg	0%	0%
Sodium [illegible]	16%	1%

0 76150 20039 3

INGREDIENTS: Popcorn, Partially Hydrogenated Soybean Oil, Salt, Butter, Natural Flavors, Annatto Color.

*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

Calories 2,000 2,500

MANUFACT[illegible] VALLEY MICROWAVE FOODS, INC., EDINA, MN 55436

Letter 211
Mary Jane Quinn
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
211.1	Ground Transportation	Access to Logan	Massport needs to let us know how 129 ("average, about") truck trips was chosen....Their truck numbers are a very important issue to us. In the EIS, 58 to 500+/day truck trips are projected. Which is it? Is it in addition to?	The number of round trip truck trips associated with construction of the Preferred Alternative as presented in the Airside Project Draft EIS/EIR ranged from a high of 324 per day to a low of 49 per day, with 129 representing the average number of daily truck trips associated with construction of the Airside Preferred Alternative. The cumulative number of truck trips for all concurrent on-airport construction projects ranged from a high of 580 to a low of eight per day. The Airside truck trips were included within the cumulative number. Construction traffic associated with the airside improvements has now been significantly reduced from the numbers presented in the Airside Project Draft EIS/EIR as a result of the reduction of soil material to be removed off-site. See Sections 6.9 and 7.5 of the Supplemental DESI/FEIR for additional discussion of construction impacts.

LETTER 212

40 Beacon Street
Chelsea, MA 02150
April 20,1999

Secretary of Environmental Affairs
attention MEPA Office
Mr. Arthur Pugsley-EOEA No.10458
100 Cambridge Street
Boston, MA 02202

Dear Mr. Pugsley:

I've enjoyed living in the Chelsea Waterfront neighborhood for the last 9 years
and I can only speak to the stunning inadequacies and blatant omissions of data
versus the reality found in Chelsea. On any page of the EIS where there is a 212.1
reference to noise, air, odor pollution; air cargo truck traffic; Environmental
Justice or 'mitigation' I know its data collection is flawed or tragically non-
existent concerning Chelsea. Of course, then, any 'conclusions' or projections
drawn from such poor 'info' gathering and reporting would have to be considered
flawed or inadequate because what you had been given to work with was such.
The EPA's best and most carefully drawn conclusions would have to be considered
pointless, since you have not been given what MEPA had requested of Massport- 212.2
an accurate, thoughtful, thorough accounting of present impacts of Logan and its
operations and a complete picture of environmental impacts of any proposal.

A few examples:
Vol. 1, ES-5: "...14/32 will provide an opportunity to reduce the most severely moise impacted population..."

Chelsea is severely impacted by jet noise (see photos). Massport will not
admit this on paper (ex:"0 noise impacted population" GEIR)--so if they won't 212.3
acknowledge it--they don't have to reduce it! Massport can't tell you what the
noise level is in Chelsea because they have chosen not to find out:

1. Chelsea was taken out of the Noise Contour Map and yet our noise has not
abated esp. considering that flight operations have doubled in that time. Massport
officials told residents and Chelsea City Councillors that we probably do have
enough jet moise to be in but they wouldn't file this info with FAA till their 212.4
normal filing time 5 yrs later.(this conveniently brings it to after this EIS
filing process)

2. The Noise Monitor on Admiral's Hill was broken for 2 YEARS, without mention, without repair, without apology, without correction to the data..."0" noise recorded, documented and tabulated as such. Reported only when residents asked specifically and repeatedly for this data.

3. In 1998, Chelsea City Councillor Preston Galarneau fought to get a noise
monitor on his Beacon St home-1 monitor delivered=broken...2cd monitor delivered=
broken...BUT even with 'non-functioning monitor' days tabulated in for those few
weeks-the numbers reportedly averaged ≥ 70dB with peaks of 100dB or greater! So if
Massport's data is so completely untrustworthy,how can they decide how much more
noise to give us(to be "equitable") if they don't know what we have now? THEIR
COLLECTION OF DATA IS INADEQUATE, THEIR MONITORING APPEARS MANIPULATED and they 212.5
have the nerve to send it to the EPA with conclusions drawn from it and proposals
based on it.

4. Now we are discovering that Massport benefits from the use of this
flawed, manipulated data. Chelsea has one of the highest immigrant, minority 212.6
and low income population in the state-7 languages 'officially' used in the public
schools, many more spoken--BUT Chelsea was taken off the Conour Map, Massport

refused to collect or consider reliable data to let us back onto Map, and so Chelsea's minority and low income population doesn't have to be included statistically by Massport in their Environmental Justice analysis which was required for this EIS. Again, how convenient.

Vol.1, ES-20: "Noise modeling analysis was conducted for all alternatives... noise contours and noise exposed populations were determined using the Integrated Model version 5.0" (Sounds good...but see above...I don't care who's 'modeling' ...the machines are broken.) How can the public, the EPA, the courts have faith in Massport's modeling if they can't or won't gather basic info properly. 212.7

Vol.1, ES-28: "Therefore there are no cumulative air quality or odor impacts associated with the Airside Project."

The one air quality monitor is on the highest hill in Chelsea and not under a flight path, nor near a jet at take-off or landing! On March 3,1998 a Massport official stated jets were "about 260 ft off the ground" in my neighborhood. Massport has been told by residents for years that on take-off and landings at this level we see emissions spewing from the jets. Massport told us that what we see is "harmless, it's been tested" or "you don't see anything, nothing comes out". 212.8 We would like to see a study included in an EIS reporting what is raining down on us and at such close quarters. We would like it examined thoroghly, but perhaps not by Massport (can you blame us?).

SINCE THERE IS NO AIR QUALITY MONITOR IN THE WATERFRONT NEIGHBORHOOD,WHERE THE PLANES ARE, MASSPORT CAN TELL US THERE IS NO AIR QUALITY PROBLEM. Their conclusion... Chelsea waterfront neighborhood can handle an additional 23,000 large jets (1 every 10 min,10 hrs/day,7days/wk-additional) at less than 300' ...why?...Because we have no noise or air pollution that THEY can find.

The EIS has a 'dollar value' for the flight delays. I would like to see several mature statistical analysis showing how such a figure was derived. I would also like to see an unbiased, detailed reporting of what exactly was the cause of each delay. With the knowledge perhaps a new, varied, less harmful, truly helpful or even cost effective alternatives may be readily apparent. 212.9

Why isn't there an economic breakdown for the citizens of the dozens of communities affected by Logan and its operations and traffic. What is the 'dollar value' lost for OUR DELAYS in Airport traffic-every day (no matter what the wind direction!)

Our health cost/missed work or school days
Our sleep loss resulting in decreased lifespan,decreased work and school
        performance...jets stop about midnite,then cargo planes throghout
        the nite,then jets at 6:15AM) 212.10
Our cost of buying(and running 24hrs/day) an air conditioner
Our car insurance(Logan Rental cars accidents charged to boston,Revere,Chelsea)
        (All 3 Tunnel accidents charged to Boston,no matter where car is based)
Damage to Our roads (causing Our flat tires,ruining Our car's suspension system)
Our own 'soundproofing' which we've paid
Our cracked walls and shattered windows etc etc etc

Why does Massport just get to put THEIR 'dollar value' on THEIR'troubles',but not ours?

MASSPORT APPEARS TO PLAY WITH THE NUMBERS,BUT ON THESE EXAMPLES, THEY DIDN'T EVEN BOTHER TO COLLECT THE NUMBERS!

There may be other ways to improve Logan's efficiency, other ways to improve regional transportation without greatly damaging lives and the environment. 212.11 But we do not know from the material Massport has chosen to collect or not collect, chose to give you or not give you.

Please help us. Logan is filled to its natural capacity now-it's stuffed but can't seem to admit it. The residents know what squeezed-in Logan and its far-flung operations do to our lives, our sanity,our towns, our children, our days and nights,our air, land and water.

We've told Logan...but they did not tell you.

Thank you very much for your time, efforts and attention.

Respectfully,

Mary Jane Quinn
40 Beacon Street
Chelsea, MA 02150

MC # 10730

"statistical nonsense" as Massport's J. Cruckfield would say.

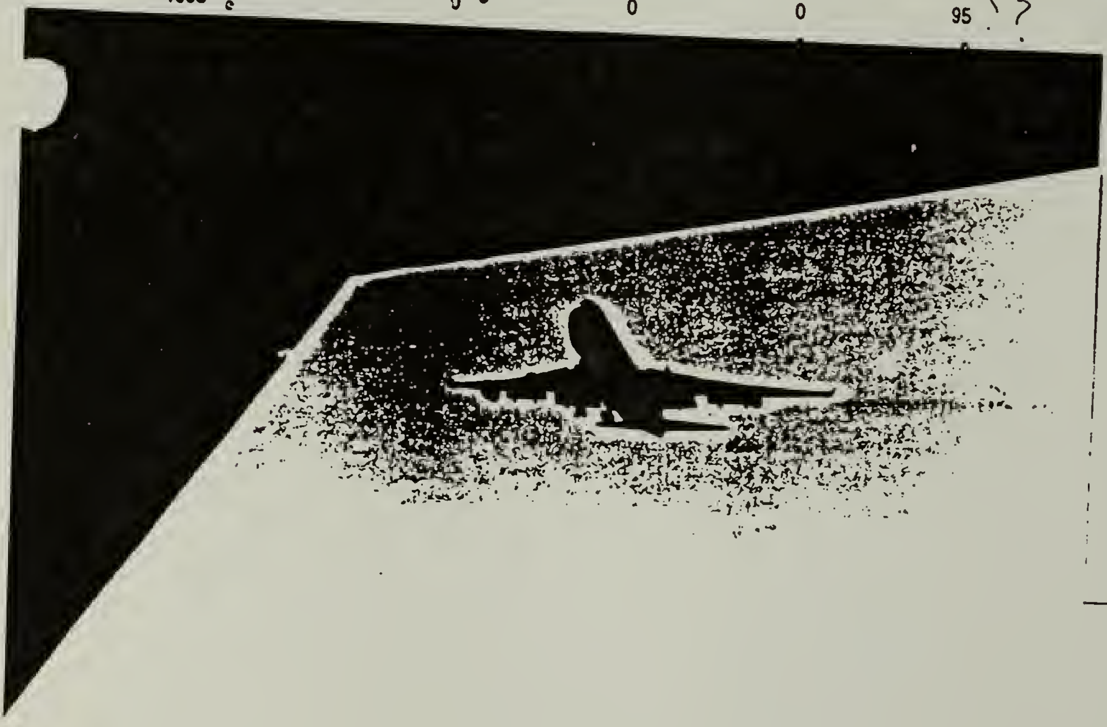
see photo*

Table 6-3
Noise-Exposed Population by Community

→ Chelsea people + environment have "noise exposur but not accordi to Massp

Year	80+ L	75-80 L	70-75 L	65-70 L	Total (65+)	60-65 L
Boston**						
1987	0	533	6,436	40,020	46,989	NA
1990	0	0 ?	1,778	28,970	30,748	NA
1993	0	0 ?	264	2,820	3,084	NA
1994	0	106 ?	265	7,698	8,069	30,895
1995	0	106 ?	851	8,815	9,772	33,765
1996	0	106 ?	374	8,775	9,255	40,992
1999	0	48 ?	58 ?	3,413	3,519	16,020
2010***	0	48 ?	58 ?	1,398	1,504	12,107
2010†	0	48 ?	58 ?	1,926	2,032	12,804
Chelsea						
1987	0	0	2,635	4,457	7,092	NA
1990	0	0	0	4,813	4,813	NA
1993	0	0	0	0	0	NA
1994	0	0	0	0 ?	0	8,510
1995	0	0	0	95 ?	95	9,750
					0	8,744
					0	4,490
					0	2,788
					0	3,065
					287	NA
					0	NA
					0	NA
					0	0
					0	0
					0	0
					0	0
					0	0
					0	0

Masspor studie Statist. modeli flawe inaccu & misleadi



← *taken from my front window, 199

And according t the proposed Chelsea mitig my house woul still not be w/in mitigati area! I se 1000's of plane like this/yr — th propose an additio

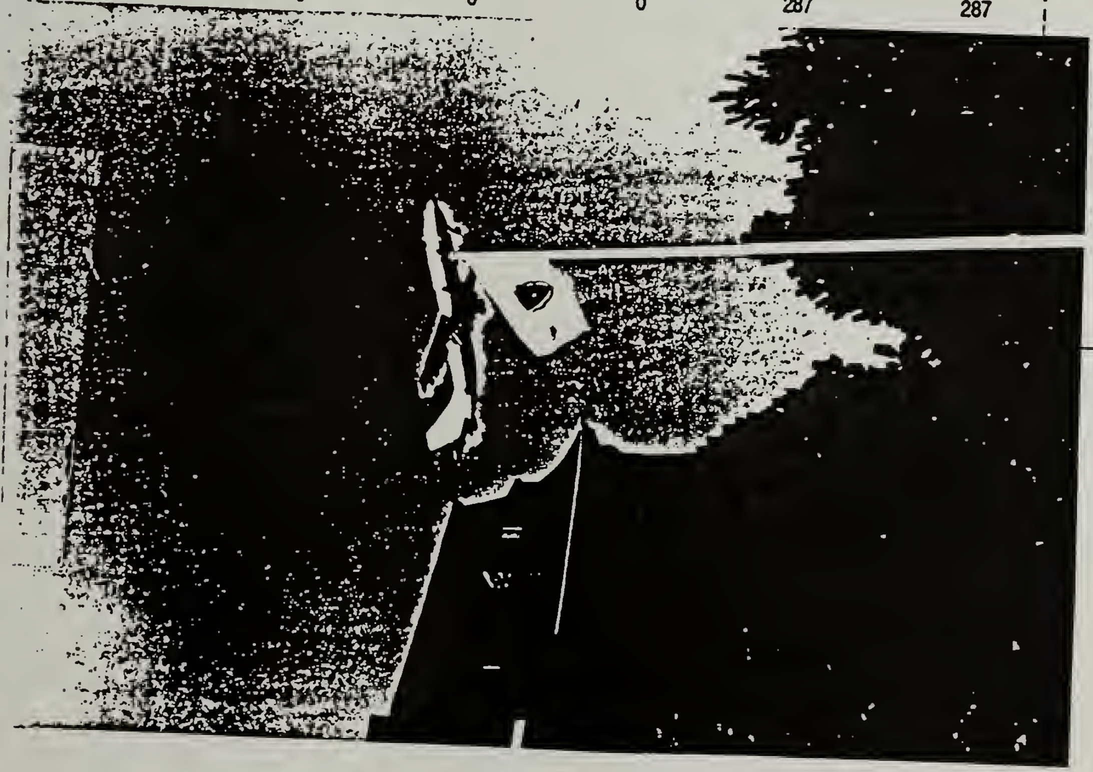
Submitted by Mary Quinn 4-8-99
40 Beacon St
Chelsea MA (waterfront District)

K:\...\Reports\Final\...
Chap06.doc

This has & will have environment impacts.....not addressed in the report accurately or at all.

Table 6-3
Noise-Exposed Population by Community

Year	80+ L_{dn}	75-80 L_{dn}	70-75 L_{dn}	*65-70 L_{dn}	Total (65+)	60-65 L_{dn}
Boston** including East Boston						
1987	0	533	6,436	40,020	46,989	NA
1990	0	0 ?	1,778	28,970	30,748	NA
1993	0	0 ?	264	2,820	3,084	NA
1994	0	106	265	7,698	8,069	30,895
1995	0	106 ?	851	8,815	9,772	33,765
1996	0	106	374	8,775	9,255	40,992
1999	0	48	58	3,413	3,519	16,020
2010***	0	48 ?	58 ?	1,398	1,504	12,107
2010†	0	48	58	1,926	2,032	12,804
Chelsea						
1987	0	0	2,635	4,457	7,092	NA
1990	0	0	0	4,813	4,813	NA
1993	0	0	0	0	0	NA
1994	0	0	0	0 ?	0	NA
1995	0	0	0	95 ?	0	8,510
1996	0	0	0	0 ?	95	9,750
1999	0	0	0	0	0	8,744
2010***	0	0	0	0	0	4,490
2010+	0	0	0	0	0	2,788
						3,065
Everett						
1987	0	0	0	287	287	NA
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	NA
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	NA
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0



Historical Aircraft Disturbance Complaints Logan International Airport 1976-1996

	1976	1977	1978	1979*	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991**	1992**	1993	1994	1995	1996	
Arlington	1	4	2	21	32	6	3	9	2	0	2	4	1	8	2	10	8	3	0	2	3	
Belmont	0	9	6	20	7	5	9	1	4	0	0	2	0	0	0	0	6	5	0	0	1	
Boston (Total)	380	786	921	3629	1856	936	826	413	434	325	357	523	493	509	422	1480	1579	1016	1016	931	866	
Brighton	0	0	50	16	3	0	0	0	1	0	0	0	1	0	1	4	1	1	1	0	3	
Charlestown	8	2	2	7	7	2	0	6	1	2	2	5	1	1	0	2	4	2	4	9	7	
Dorchester	21	9	42	423	60	12	7	6	4	1	5	39	11	13	14	37	43	17	13	36	10	
East Boston	145	481	338	1061	577	324	403	263	284	175	141	159	153	282	193	234	466	475	539	381	361	E. Boston
Hyde Park	0	0	1	29	13	6	2	21	5	1	4	1	0	0	0	11	3	0	3	0	1	
Jamaica Plain	72	135	139	560	293	152	151	45	51	58	93	195	224	96	84	289	243	123	98	106	107	
Roslindale	4	0	14	120	210	92	69	21	30	29	21	22	11	17	4	19	87	34	9	16	22	
Roxbury	25	10	28	118	48	38	21	13	17	7	20	11	13	10	13	11	6	20	10	15	7	
South Boston	72	77	213	855	368	207	88	9	14	20	22	55	42	41	47	250	299	96	111	117	201	
South End	0	23	27	296	140	41	35	10	4	6	1	4	6	2	28	545	349	207	192	104	100	
West Roxbury	6	0	41	97	68	58	39	10	9	22	33	14	7	24	4	35	6	9	1	6	10	
Other	27	49	26	47	69	5	13	9	14	6	15	18	24	23	34	43	72	32	35	141	37	
Braintree					15	0	0	0	0	0	3	0	2	4	5	32	47	22	24	18	8	
Brookline	7	13	33	426	158	21	13	4	6	5	5	13	6	12	12	84	225	20	5	13	32	
Cambridge	25	54	27	170	37	6	8	9	1	3	22	18	24	14	14	34	49	31	13	33	19	
Chelsea						14	27	11	6	2	8	3	5	17	16	11	27	16	17	24	485	Chelsea
Cohasset				0	146	7	10	20	16	10	6	2	2	2	0	0	6	0	1	1	4	
Dedham				0	17	8	1	1	0	0	2	0	0	1	1	5	2	2	2	3	4	
Everett	11	0	8	26	10	7	27	10	10	5	2	0	1	3	5	4	16	2	0	4	24	
Hingham	1	0	4	112	97	21	23	6	4	1	1	2	4	4	3	14	42	16	15	4	5	
Hull	1	0	63	361	1330	144	68	33	16	13	13	22	22	20	21	41	72	78	45	44	27	
Lynn	1	6	38	37	61	45	25	10	4	2	11	15	6	3	4	2	3	3	2	2	2	
Malden	6	4	3	18	5	0	32	9	4	1	1	2	1	0	4	1	8	3	4	1	7	
Marblehead	0	0	0	0	3	1	0	0	0	3	15	4	2	1	2	0	2	0	2	2	4	
Medford	26	58	24	58	118	105	65	29	13	11	10	28	37	23	15	15	36	3	5	24	19	
Melrose	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0	1	3	1	2	2	1	
ilton	1	0	308	1392	583	387	163	165	114	70	105	117	98	77	149	586	308	425	249	204	369	
ahant	5	6	80	22	17	12	0	10	1	0	13	8	10	5	2	23	206	292	74	102	152	
eedham	4	3	3	120	238	10	27	30	29	27	25	37	22	2	0	9	9	1	3	19	3	
ewton	3	8	2	78	24	4	14	3	3	1	0	4	3	3	5	26	29	5	2	7	1	
uincy	71	34	4527	4525	860	218	109	97	104	63	78	53	38	34	16	92	72	51	16	17	39	
vere	27	46	157	318	129	83	27	78	39	20	99	41	57	47	132	109	165	798	918	199	476	
ugus	0	0	0	3	0	0	0	0	0	0	2	0	0	0	1	7	4	6	0	2	0	
ituate	0	0	0	0	135	10	5	10	3	1	2	0	1	2	2	2	0	1	3	0	1	
merville	15	30	8	88	23	7	7	12	3	1	5	17	3	6	5	8	50	18	13	15	16	
ampscott	0	0	0	0	0	4	1	125	106	71	167	82	29	12	26	27	3	36	2	0	6	
ymouth	0	0	1	11	22	7	13	19	134	160	30	91	137	85	104	75	170	113	138	109	213	
nchester	11	49	23	24	16	0	12	2	1	1	10	5	1	6	1	1	2	0	0	12	10	
nthrop	75	98	589	2278	1303	648	288	211	240	107	277	795	389	663	1003	817	542	899	664	717	938	938 Winthrop
burn	0	9	8	20	0	0	2	0	0	0	1	1	0	0	1	11	12	2	3	0	4	
er	52	32	213	243	160	27	24	21	25	3	20	20	38	51	50	70	87	63	44	34	172	
AL	725	1247	7047	14000	7402	2753	1832	1348	1322	906	1294	1909	1434	1615	2023	3599	3790	3933	3282	2545	3913	

ternative flight tracks were being tested on Runway 22.

lternative flight tracks were being tested on Runway 27 (Nov. & Dec. 1991, Jan. & Feb. 1992).

Massport officials have been told by Chelsea City
Councilors at Public mtgs for yrs (& phone conversations)
that Operators at "Noise Abatement Hotline" are
"rude" "do not copy complaints accurately at all"
"s of busy signals" "no Spanish speaking opers" "etc
conducive to encouraging phone
complaints and yet complaint [illegible]

Table 6-3
Noise-Exposed Population by Community

Massport style

averaged over 7 day/wk
Not per exposure
- still many planes w/ >65 dn over Chelsea
- creative statistics

Year	80+ L_{dn}	75-80 L_{dn}	70-75 L_{dn}	*65-70 L_{dn}	Total (65+)	60-65 L_{dn}
Boston**						
1987	0	533	6,436	40,020	46,989	NA
1990	0	0	1,778	28,970	30,748	NA
1993	0	0	264	2,820	3,084	NA
1994	0	106	265	7,698	8,069	30,895
1995	0	106	851	8,815	9,772	33,765
1996	0	106	374	8,775	9,255	40,992
1999	0	48	58	3,413	3,519	16,020
2010***	0	48	58	1,398	1,504	12,107
2010†	0	48	58	1,926	2,032	12,804
Chelsea						
1987	0	0	2,635	4,457	7,092	NA
1990	0	0	0	4,813	4,813	NA
1993	0	0	0	0	0	NA
1994	0	0	0	0	0	8,510
1995	0	0	0	95	95	9,750
1996	0	0	0	0	0	8,744
1999	0	0	0	0	0	4,490
2010***	0	0	0	0	0	2,788
2010+	0	0	0	0	0	3,065
Everett						
1987	0	0	0	287	287	NA
1990	0	0	0	0	0	NA
1993	0	0	0	0	0	NA
1994	0					
1995	0					
1996	0					
1999	0					
2010**	0					
2010+	0					

Must have indepen study

Indepen group giving you data so that you may make an informed decision

212.12

Mary Quinn
Chelsea Waterfront
7-8-99 Subm. Test
re. Runway 1432

[illegible] 1998 Beacon St
Chelsea MA

waterfront Neighborhood

Table 6-3
Noise-Exposed Population by Community

average / 7 am
24 hrs / Not per. exp 3 pm
Plenty of > 65 dn
planes over Chelsea
— just = statistical
nonsense
Jenny Crafted! would
say

Year	80+ L_{dn}	75-80 L_{dn}	70-75 L_{dn}	*65-70 L_{dn}	Total (65+)	60-65 L_{dn}
Boston**						
1987	0	533	6,436	40,020	46,989	NA
1990	0	0 ?	1,778	28,970	30,748	NA
1993	0	0	264	2,820	3,084	NA
1994	0	106	265	7,698	8,069	30,895
1995	0	106 ?	851	8,815	9,772	33,765
1996	0	106	374	8,775	9,255	40,992
1999	0	48	58	3,413	3,519	16,020
2010***	0	48 ?	58 ?	1,398	1,504	12,107
2010†	0	48	58	1,926	2,032	12,804
Chelsea						
1987	0	0	2,635	4,457	7,092	NA
1990	0	0	0	4,813	4,813	NA
1993	0	0	0	0	0	NA
1994	0	0	0	0 ?	0	8,510
1995	0	0	0	95 ?	95	9,750
1996	0	0	0	0 ?	0	8,744
1999	0	0	0	0	0	4,490
2010***	0	0	0	0	0	2,788
2010+	0	0	0	0	0	3,065
Everett						
1987	0	0	0	287	287	NA
1990	0	0	0	0	0	NA
1993	0	0	0	0	0	NA
					0	0
					0	0
					0	0
					0	0
					0	0
					0	0

Need indepen group to gather & report statist to you. Thank you

Taken 1998.

← From 2nd floor window of 3 story house (w/ 50 mm lens which shows size as our eye sees it... right size)

268' flight path now and they want to be on instruments in bad weather [illegible]

Letter 212
Mary Jane Quinn
Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
212.1	Environmental Review Process	Impacts	…On any page of the EIS where this is a reference to noise, air, odor pollution; air cargo truck traffic; Environmental Justice or 'mitigation,' I know its data collection is flawed or tragically non-existent concerning Chelsea. Of course, then, any 'conclusions' or projections drawn from such poor 'info' gathering and reporting would have to be considered flawed or inadequate because what you had been given to work with was such.	Noise was identified as the only off-airport impact associated with the Preferred Alternative (refer to Section 6.2 of the Supplemental DEIS/FEIR for a discussion on noise impacts). Environmental and health studies relating to the City of Chelsea were reviewed to assess the potential for other cumulative or multiple adverse exposures, since the increase in population within the 65 dB DNL contour associated with the Preferred Alternative is primarily within this community. A review of issues within Chelsea indicated a concern regarding toxic discharges associated with industrial facilities, truck emissions, and contamination of Chelsea Creek. There was nothing to suggest that these issues increased the noise impacts associated with the Preferred Alternative. Mitigation of the increased noise within the 65 dB DNL noise contour will be provided to affected communities in the form of residential sound insulation. Refer to Section 6.8 of the Supplemental DEIS/FEIR for additional information. The dispersion model portion of the LDMS is an EPA-approved model. The methodology is consistent with FAA and EPA guidelines.
212.2	Environmental Review Process	MEPA	…you have not been given what MEPA had requested of Massport—an accurate, thoughtful, thorough accounting of present impacts of Logan and its operations and a complete picture of environmental impacts of any proposal.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives. The Secretary of Environmental Affairs found that "…the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act…". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999.
212.3	Noise	Impacts	Chelsea is severely impacted by jet noise (see photos). Massport will not admit this on paper (ex: "0 noise impacted population" GEIR)—so if they won't acknowledge it—they don't have to reduce it! Massport can't tell you what the noise level is in Chelsea because they have chosen not to find out.	Tables 6.2-4 and 6.2-5 show the noise exposed population for Chelsea for the 29M Low and 37.5M High Fleet scenarios, respectively. Although both show no noise exposed population in DNL 70 dB and above, both show noise exposed population in the DNL 65 dB and DNL 60 dB and above categories.
212.4	Noise	Impacts	Chelsea was taken out of the Noise Contour Map and yet our noise has not abated, esp. considering that flight operations have doubled in that time. Massport officials told residents and Chelsea City Councillors that we probably do have enough jet noise to be in but they wouldn't file this info with FAA till their normal filing time 5 years later. (This conveniently brings it to after this EIS filing process.)	Chelsea appears on the basemaps showing the noise contours for each of the fleets and alternatives studied. The community is exposed to noise either from 60 to 65 dB or from 65 to 70 dB, depending on the fleet and alternative being evaluated. Chelsea is also listed as a separate community in the tables of population counts by increment of exposure (Tables 6.2-4 through 6.2-7 and 6.2-20 and 6.2-21).
212.5	Noise	Impacts	…how can they decide how much more noise to give us (to be "equitable") if they don't know what we have now? THEIR COLLECTION OF DATA IS INADEQUATE, THEIR MONITORING APPEARS MANIPULATED and they have the nerve to send it to the EPA with conclusions drawn from it and proposals based on it.	Comment noted. The EPA will draw its own conclusions regarding the efficacy of the data and findings presented here.

Code	Topic 1	Topic 2	Comment	Response
212.6	Environmental Justice	Impacts	Now we are discovering that Massport benefits from the use of this flawed, manipulated data. Chelsea has one of the highest immigrant, minority and low income population in the state—7 languages 'officially' used in the public schools, many more spoken—BUT Chelsea was taken off the Contour Map...	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.
212.7	Noise	Impacts	Vol. 1, ES-20: "Noise modeling analysis was conducted for all alternatives... noise contours and noise-exposed populations were determined using the Integrated Model version 5.0." (Sounds good...but see above...I don't care who's 'modeling'...the machines are broken.) How can the public, the EPA, the courts have faith in Massport's modeling if they can't or won't gather basic info properly.	Comment noted. The EPA will draw its own conclusions regarding the efficacy of the data and findings presented here.
212.8	Air Quality	Impacts	...Massport has been told by residents for years that on takeoff and landings at this level [260 ft.] we see emissions spewing from the jets. Massport told us that what we see is "harmless, it's been tested" or "you don't see anything, nothing comes out." We would like to see a study included in an EIS reporting what is raining down on us and at such close quarters. We would like it examined thoroughly, but perhaps not by Massport (can you blame us?).	In 1997, Massport conducted a Soot Deposition Study at Logan Airport and the surrounding communities. The results of this study did not identify any discernable differences in samples collected on, or in the vicinity of, the airport compared to samples collected away from the airport. DEP also maintains a permanent air monitoring station (the "Bremen Street" station) in close proximity to Logan Airport. Data collected at this station has continually shown that the air quality meets the NAAQS.

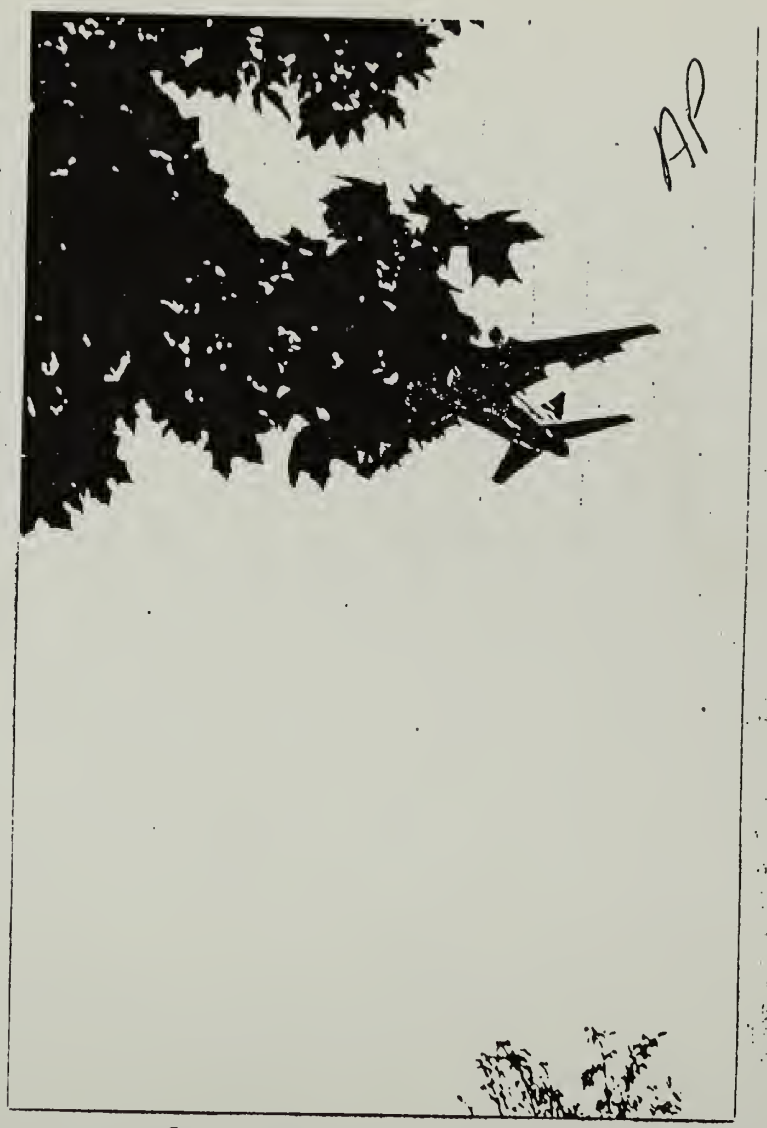
Code	Topic 1	Topic 2	Comment	Response
212.9	Delay	Model	The EIS has a 'dollar value' for the flight delays. I would like to see several mature statistical analyses showing how such a figure was derived. I would also like to see an unbiased, detailed reporting of what exactly was the cause of each delay. ...	The cost of delay analysis presented in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR is based on a methodology recommended by the FAA. The cost of delay to a passenger ($27 per hour) is a weighted average cost for business and leisure passengers. Refer to FAA APO Bulletin APO-97-1. Chapters 1 and 4 of the Supplemental DEIS/FEIR provide analysis of delays at Logan. Delays primarily occur when wind or weather conditions require the use of configurations with fewer than three active runways or when poor weather requires increased separation distances between aircraft. Proposed Runway 14/32 would be designed to reduce delays at Logan Airport from adverse winds Refer to Section 1.4 and Appendix C of the Supplemental DEIS/FEIR contains a description of the delay factors at Logan Airport, and a discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport with other United States airports.
212.10	Environmental Justice	Impacts	Why isn't there an economic breakdown for the citizens of the dozens of communities affected by Logan and its operations and traffic? What is the 'dollar value' lost for OUR DELAYS on airport traffic—every day (no matter what the wind direction!) • health cost/missed work or school days, • sleep loss resulting in decreased lifespan, decreased work and school performance, • cost of buying (and running 24 hrs/day) an air conditioner • damage to our roads • our own 'soundproofing' which we've paid • our cracked walls and shattered windows, etc. Why does Massport just get to put THEIR 'dollar value' on THEIR 'troubles,' but not ours?	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR documents comply with all applicable NEPA and MEPA requirements. A cost benefit analysis is not required by federal or state law and would not provide appropriate context. Cost information mentioned in the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR is intended to provide analytic context.
212.11	Alternatives	Other Non-construction Alternatives	There may be other ways to improve Logan's efficiency, other ways to improve regional transportation without greatly damaging lives and the environment. But we do not know from the material Massport has chosen to collect or not collect, chose to give you or not give you.	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's *Logan Capacity Enhancement Plan* (October 1992); the *Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study* (December 1993); the *Logan Final GEIR* (July 1993); and the *Logan Airside Improvements Feasibility Study, Phase 1 Report*, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its *Boston Logan International Airport Capacity Enhancement Plan.* The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the *Logan Airside Feasibility Study*, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.

Code	Topic 1	Topic 2	Comment	Response
212.12	Noise	Model	Table 6-3, Noise-Exposed Population by Community [in Logan GEIR]...averaged [noise] over 24 hrs and 7 day/week. Not per exposure. [There are still]...many planes with >65 Ldn over Chelsea...[These are] creative statistics. Must have independent study [by an] independent group giving ...[Massport] data so that ...[Massport] may make an informed decision.	Table 6-3 in the Logan Airport 1994/1995 GEIR is similar to that in Tables 6.2.4 and 6.2.5 in the Supplemental DEIS/FEIR. The Supplemental DEIS/FEIR also gives values of the maximum sound levels at 23 sites in Table 6.2.8 of the Supplemental DEIS/FEIR and the time-above threshold at those sites in Table 6.2.13 of the Supplemental DEIS/FEIR. Additional data can be found in the Appendix E of the Supplemental DEIS/FEIR. The Supplemental DEIS/FEIR uses the DNL as the primary descriptor of aircraft noise exposure in the community. This metric was developed by the United States EPA for this purpose and was found by the EPA to correlate better with the effects of noise on humans than any other descriptor. The methodology used is in the Supplemental DEIS/FEIR is in accordance with all applicable federal guidelines and is the same methodology that would be required for a noise study performed by any other independent firm.

LETTER 213

[redacted]

RECEIVED
APR 6 1993
MEPA



AP

From my front step, Chelsea Waterfront – but
Massport states "zero noise impacts on Chelsea"
Their faulty conclusion – from faulty DATA" from

7-4-99

broken noise monitor Admiral's Hill for 2 yrs — it read 0 w/ planes like this — they wrote "0" — they sent "0" to FAA — they knew monitor broken — they used that 'data' — they sent it to FAA + EPA and yet we have to read in Sun globe 4/4/99 Jeremy Crockford, massport spokesman, said "This is the triumph of statistical nonesense over common sense!" (he refering to CAG 'delay' report)

Hello ?!!!

Massport, at least - at the minimum gives EPA faulty info & asks them to make a ruling on it alone - knowing they (EPA) don't have the budget to do their own investigation - and, could we say, at worse, they have knowingly chosen faulty info to send ?!!

Please consider other options — study before our towns are destroyed & emptied. Thank you for listening. 213.1

MARY QUINN
Chelsea MA

Letter 213

Mary Quinn

Private Citizens: Chelsea

Code	Topic 1	Topic 2	Comment	Response
213.1	Noise	Impacts	[Massport's conclusion that there are] "zero noise impacts on Chelsea" [is based on] faulty data from [a] broken noise monitor [or] Admiral's Hill.	The noise monitoring site on Admiral's Hill played no part in analyzing noise from future alternatives with Future Fleet scenarios.

LETTER 214

EoEA #10458 Draft eir/eis.
Logan Airside improvement planning project
Mepa unit - EoEa
Arthur Pugsley - 100 Cambridge ST 20 floor
Boston, Mass 02202

The eis/eir has been fairly well done. I
support the use of the new runway described in the 214.1
report. It will eliminate delays and ease some
airways problems.

However, the political aspect of this project
has to be evaluated. Since the city of Boston
is opposed, it will be difficult to complete the
project and probably it won't happen.

If you develop Hanscom or Worcester
airport as the second airport, how does one 214.2
deal with transfers from major airlines to small
planes that travel to Nantucket, Banger, etc? It
seems a massive new realignment of airline is
necessary. I don't think Logan is ready for this

Another concern - More flights if possible 214.3
should ascend or descend over the ocean before
turning at higher altitude west/south/. and north.
Not mentioned in the report is the problem of fuel
dropping in detail. Fuel does drop over cohasset 214.4
when descending to Logan. My house is under the
path, thus we join the other communities of the

negative effects and aspects of an urban airport.
The best solution in time is moving the
airport to a new area such as Hanscom and/or 214.5
South Weymouth. Highway access could easily
be achieved. There should have been a more in
depth analysis of Hanscom and South Weymouth
airports

TEACH TOLERANCE
Martha K. Gjesteby
81 Old Pasture Rd
Cohasset, MA 02025

Cohasset Mass. 02025
Martha Gjesteby

Letter 214
Martha Gjestby
Private Citizens: Cohasset

Code	Topic 1	Topic 2	Comment	Response
214.1	General Support		The EIS/EIR has been fairly well done. I support the use of new runway described in the report. It will eliminate delays and ease some airways' problems.	Comment noted.
214.2	Regional Transportation	Regional Airports	If you develop Hanscom or Worcester Airport as the second airport, how does one deal with transfers from major airlines to small planes that travel to Nantucket, Bangor, etc.? ...	Commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field or Worcester Regional Airport, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights.
214.3	Alternatives	Operational Restrictions	...More flights, if possible, should ascend or descend over the ocean before turning at higher altitudes west, south and north.	The operations of Proposed Runway 14/32 would be over the water. The departures on Runway 14 would turn over the inner harbor and proceed out the harbor mouth, as do the departures on Runway 15R, the nighttime preferential runway. Similarly, the last several miles of the approach path to Runway 32 would be over water and largely uninhabited islands. When Runway 14/32 is in operation, it would reduce the noise exposure over populated communities.
214.4	Air Quality	Impacts	Not mentioned in the report is the problem of fuel dropping in detail. Fuel does drop over Cohasset when descending to Logan. My house is under the path, thus we join the other communities of the negative effects and aspects of an urban airport.	Fuel dumping (dropping) typically occurs only in aircraft emergencies. Air traffic control makes every effort to direct the pilot away from residential and other populated areas during this procedure. Notwithstanding the above, the Federal Aviation Administration (FAA) requirements allow fuel dumping at or above an altitude of 2,000 feet. This distance above ground allows much of the fuel to evaporate and disperse. Thus, emergency fuel dumping should have little or no impact on human health and welfare.
214.5	Regional Transportation	Regional Airports	The best solution in time is moving the airport to a new area such as Hanscom and/or South Weymouth. ...	Section 2.8 of the Supplemental DEIS/FEIR discusses passenger and activity growth at the regional airports and their effect on Logan Airport's projected passenger and activity levels. With regard to ridership projections on Amtrak's high-speed rail, the Airside Project Draft EIS/EIR described in detail the best current information. No updated projections are available. Refer to Appendix B for Amtrak's letter stating that no revised ridership estimates are available. Massport has no jurisdiction over the development, operation or use of infrastructure at airports other than Logan Airport, Hanscom Field, and Worcester Regional Airport (as of January 15, 2000). Massport plays no role, however, in the decisions of private airlines regarding air service routes or service levels. As proprietor of Logan Airport, Massport's primary responsibility is to supply, operate, and maintain Logan Airport's infrastructure that includes the runways, taxiways, terminal buildings, parking facilities and access roads. As a recipient of federal airport grants, Massport must adhere to grant covenants that require it to operate Logan Airport in such a way so as to ensure access and availability for public use on fair and reasonable terms and without unjust discrimination.

123 Stoughton Street
Dorchester, MA 02125

LETTER 215

April 16, 1999

Arthur Pugsley
MEPA Unit
Executive Office of Environmental Affairs
100 Cambridge Street, 20th Floor
Boston, MA 02202

Dear Sirs,

I'm sure you are all well aware of all the issues regarding the proposed expansion of Logan Airport with runway 14/32. As the proposal is coming up for review at your office in just a few short days, I wish to register my strong opposition to the plan. The cons are well known; increased air and noise pollution are just two of them. There is also a reason to consider the environmental justice of the proposal. No one can reasonably see the addition of the runway as anything but expansion. But if we are all going to enjoy the benefits of increased air travel, we must all take on the burdens that come with it. Massport must go back and look at all options, including, but not limited to, increased reliance on rail travel and the development of a regional transportation plan before considering new runways. Massport has not done their job. My family and I urge you to let them know in no uncertain terms that this is the case. Thanks for your time. 215.1 215.2

Regards,

Michael P. County

Letter 215
Michael P. County
Private Citizens: Dorchester

Code	Topic 1	Topic 2	Comment	Response
215.1	General Opposition		...As the proposal is coming up for review at your office in just a few short days, I wish to register my strong opposition to the plan. The cons are well known; increased air and noise pollution are just two of them. There is also a reason to consider the environmental justice of the proposal. ...	The Environmental Justice analysis in Section 6.8 was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation.
215.2	Regional Transportation	Regional Airports	... Massport must go back and look at all options, including, but not limited to, increased reliance on rail travel and the development of a regional transportation plan before considering new runways.	The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives. Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 of the Supplemental DEIS/FEIR indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.

Bcc: Arthur Pugsley@MEPA@EOEA
From: "Barbara McDonough" <McDonough@rascal.med.harvard.edu>
ject: runway 14/32
e: Wednesday, April 21, 1999 16:53:29 EDT
ach:
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

LETTER 216

Dear Mr. Pugsley,

216.1 I am writing to voice my concern over plans to expand Logan Airport's runways. Massport's Environmental Impact study is inadequate because it uses 1993 data instead of 1998 data, AND because it doesn't look at the health and environmental problems or the economic losses (real estate devaluation) that will be caused by Runway 14/32.

216.2 I hope that you will consider these concerns and the negative impact they will have on our neighborhood. Thank you.

Sincerely,

Barbara McDonough
Hilltop Street
chester, Ma 02124

Letter 216
Barbara McDonough
Private Citizens: Dorchester

Code	Topic 1	Topic 2	Comment	Response
216.1	Analysis Assumptions/ Methodologies	Base Year	I am writing to voice my concern over plans to expand Logan Airport's runways. Massport's Environmental Impact Study is inadequate because it uses 1993 data instead of 1998 data.	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and to provide context to the delay problem at Logan Airport. The appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project is a comparison of the Preferred Alternative to the No Action Alternative, not a comparison of the Preferred Alternative to the base year.
216.2	Public Health	Effects	Massport's Environmental Impact Study is inadequate because it doesn't look at the health and environmental problems or the economic losses (real estate devaluation) that will be caused by Runway 14/32.	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport. The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives. According to 40 CFR Part 1502 Environmental Impact Statements Regarding Cost-Benefit analysis " for purposes of complying with the act, the weighing of the merit and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis..." The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR respond to federal and state scoping directives and applicable FAA environmental orders and all other NEPA and MEPA requirements, and provide appropriate analytical content for assessing alternatives.

LETTER 217

April 21, 1999

John C. Silva
Manager, Environmental Programs
Airports Division, FAA-600
New England Region
12 New England Executive Park
Burlington, MA 01803

Secretary of Environmental Affairs
Attention MEPA Office
Arthur Pugsley - EOEA # 10458
100 Cambridge Street
20th Floor
Boston, MA 02202

Mr. John Silva and Arthur Pugsley:

In response to the Draft Environmental Impact Statement Report [EOEA #10458] presented by Massachusetts Port Authority for Logan Airside Improvements Planning Project, I find the draft EIS/EIR report insufficient in content to make an informed decision regarding the environmental impact of these improvements on the surrounding communities. I present the following questions as a condo owner and resident of Dorchester, MA.

1. Pages ES-22 and ES-23 indicate a 2 mile inland impact of Day/Night Sound Levels – 65 dB contours for Alt.1A and Alt.4. However, more traffic has consistently traveled over Roxbury and parts of Dorchester (a radius in excess of 2 miles from Logan airport) during the period of sampling. How can the model produce accurate results when the radius of land covered is grossly understated for data sampling and how can anyone (including Massport) conclude that one alternative provides less noise over another alternative when the data sampled is deficient and excludes critical noise level exceedances? 217.1
2. How was the noise level sampling collected in Roxbury?
   a) Specifically what time of day and/or night and in what frequency and over how many days or months were the data collected to assess sound levels?
   b) Did the sampling days and times coincide with the increased operations flying over Roxbury and Dorchester?
      I. If not, how can the model used by Massport be accurate in its assessment of the sound level impact to communities south of Roxbury and Dorchester?
      II. If so, what were the noise levels recorded and how many occurrences of noise exceedances were detected by the monitor? 217.2
   c) Was the noise monitor in proper working order every day from the original placement to the final removal day of the noise monitor?
      I. If not, how many days and number of hours did the noise monitor fail to operate in proper working order?
      II. Was the failure of the noise monitor detected and replaced? At what period did this occur and what workarounds or testing was implemented?
3. As a result of increased traffic over Roxbury and Dorchester from delays at Logan, why did the FAA not review these two low income minority communities to determine whether they qualify for impacted community status? 217.3 Why did the FAA not request an increase in noise monitoring and payment by Massport for sound proofing of public and private property affected by excessive noise levels when the flight path was changed to fly over Roxbury and Dorchester which prompted excessive noise level complaints by community residents? 217.4

4. In assessing noise levels and determining the classification of an impacted community, what is FAA's role in controlling or preventing planes from flying below legal and/or acceptable levels over communities such as Roxbury or Dorchester that do not directly abut the airport? 217.5

5. Page 6-105, Table 6.6-3 compares existing Logan soil quality data with Logan modernization unregulated soil criteria.
   a) Where is the soil quality data from test samples for the runway to be built into the water? 217.6
   b) What is MEPA's role in halting or delaying construction of a runway if it is determined that the cost of removing or remediating contaminated soil greatly exceeds Massport's budget and greatly outweighs any financial or environmental benefits of building the new runway? 217.7
   c) Does MEPA think it is prudent to proceed with construction of a runway into water that flows into a larger body of water without collecting soil samples from the proposed construction site to determine progressive environmental impact to marine life and the quality of soil and cost of disposal or remediation? 217.8

Respectfully submitted,

Karen L. Rucker

Karen L. Rucker

Letter 217
Karen L. Rucker
Private Citizens: Dorchester

Code	Topic 1	Topic 2	Comment	Response
217.1	Noise	Model	Pages ES-22 and ES-23 indicate a 2-mile inland impact of Day/Night Sound Levels--65 dB contours for Alt. 1A and Alt. 4. However, more traffic has consistently traveled over Roxbury and parts of Dorchester (a radius in excess of 2 miles from Logan Airport) during the period of sampling. How can the model produce accurate results when the radius of land covered is grossly understated for data sampling and how can anyone (including Massport) conclude that one alternative provides less noise over another alternative when the data sampled is deficient and excludes critical noise level exceedances?	The contours in Figures ES-5 and ES-6 on pages ES-22 and ES-23 of the Airside Project Draft EIS/EIR are for Day/Night Sound Levels (DNL) of 65 dB. The analysis extended much further from Logan Airport than required for the 65 dB DNL contours and for the 60 dB DNL contours which may be found in the Appendix E of the Supplemental DEIS/FEIR. The analysis in Roxbury and Dorchester included representative flight tracks over each community, with annual average aircraft operations on each flight track, so that aircraft noise was accounted for in each community.
217.2	Noise	Impacts	How was the noise level sampling collected in Roxbury? a) Specifically, what time of day and/or night and in what frequency and over how many days or months were the data collected to assess sound levels? b) Did the sampling days and times coincide with the increased operations flying over Roxbury and Dorchester? I. If not, how can the model used by Massport be accurate in its assessment of the sound level impact to communities south of Roxbury and Dorchester? II. If so, what were the noise levels recorded and how many occurrences of noise exceedances were detected by the monitor? c) Was the noise monitor in proper working order every day from the original placement to the final removal day of the noise monitor? I. If not, how many days and number of hours did the noise monitor fail to operate in proper working order? II. Was the failure of the noise monitor detected and replaced? At what period did this occur and what work-arounds or testing was implemented?	Noise data were acquired in Roxbury for the tests of the Runway 27 departure procedure in the winter of 1991 to 1992. These data indicated a reasonable correlation between measurement and modeling based on the radar tracks. In 1997, a permanent noise monitor was installed in the Boston Latin Academy in Roxbury under the new flight path. The data for part of 1997 were reported in the 1997 Annual Update in Table 5-5, and the data for 1998 were reported in the 1998 Annual Update in Table 5-6. The 1998 data show both the total noise and the total noise from aircraft, as well as the INM-calculated values of DNL. The agreement is excellent.

Code	Topic 1	Topic 2	Comment	Response
217.3	Environmental Justice	Impacts	As a result of increased traffic over Roxbury and Dorchester from delays at Logan, why did the FAA not review these two low income minority communities to determine whether they qualify for impacted community status?	The Environmental Justice analysis was expanded for the Supplemental DEIS/FEIR. Low-income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. This analysis found that there is no high and adverse disproportionate impact to low-income and minority populations caused by the Preferred Alternative. Adverse impacts are not predominately borne by low-income or minority populations. Only 21 percent of the population within the 65 dB DNL contour for the Preferred Alternative is minority, compared to the Suffolk County minority population of 38 percent. Less than two percent of the population within the 65 dB DNL contour for the Preferred Alternative has a household income less than 150 percent of poverty level. The additional area within the 65 dB DNL noise contour associated with the Preferred Alternative includes a predominately Hispanic neighborhood in Chelsea which is predicted under worst case assumptions to experience an increase of 0.6 dB or less. Under FAA standards, this change is not a significant adverse impact. The minority and low-income populations in South Boston and East Boston affected by the Preferred Alternative 65 dB DNL contour are almost identical to the No Action Alternative. The 65 dB DNL contour for the Preferred Alternative does not extend into Jamaica Plain, Roxbury and the South End. Mitigation of the increased noise within the 65 dB DNL contour will be provided to affected communities in the form of residential sound insulation. A discussion of the Environmental Justice analysis is presented in Section 6.8 of Supplemental DEIS/FEIR.
217.4	Noise	Soundproofing	Why did the FAA not request an increase in noise monitoring and payment by Massport for soundproofing of public and private property affected by excessive noise levels when the flight path was changed to fly over Roxbury and Dorchester which prompted excessive noise level complaints by community residents?	The delays at Logan Airport did not increase air traffic over Roxbury and Dorchester and may have reduced such overflights. Because of the concern for the noise under the new departure heading (235 degrees magnetic), Massport has added two new noise monitors, Monitor No. 27 in Roxbury and Monitor No. 29 in Mattapan. However, the noise levels in these two communities are less than the minimum criteria for FAA approval of a sound insulation program.
217.5	Noise	Impacts	In assessing noise levels and determining the classification of an impacted community, what is FAA's role in controlling or preventing planes from flying below legal and/or acceptable levels over communities such as Roxbury or Dorchester that do not directly abut the airport?	The FAA establishes standard arrival and departure procedures, which provide for the safe and expeditious flow of air traffic. It is FAA noise policy to select flight tracks and altitudes to minimize noise exposure. The departure procedure for Runway 27, for example, was established through a lengthy public Environmental Impact Review involving the FAA, Massport and all interested communities.
217.6	Soil/Sediment	Testing	Where is the soil quality data from test samples for the runway to be built into the water?	The runway will not be built into Boston Harbor. All construction is confined to upland areas of the existing airfield. Airfield soil sample data are presented in Section 6.7 of the Supplemental DEIS/FEIR.

Code	Topic 1	Topic 2	Comment	Response
217.7	Environmental Review Process	MEPA	What is MEPA's role in halting or delaying construction of a runway if it is determined that the cost of removing or remediating contaminated soil greatly exceeds Massport's budget and greatly outweighs any financial or environmental benefits of building the new runway?	The requirements for removing or remediating soil for the Airside Improvements have decreased from the estimates in the Airside Project Draft EIS/EIR because both the volume of soil to be removed and the level of contamination in the soil is much lower than anticipated at the time of the Airside Project Draft EIS/EIR analysis. The volume of excavate has been reduced as a result of the on-going removal of stockpiled Central Artery/Tunnel soil material from Governors Island, and the findings of a subsurface investigation program show that much of the existing soil material on the airport is suitable for construction and therefore does not have to be removed. Refer to Section 6.7 of the Supplemental DEIS/FEIR.
217.8	Soils	Testing	Does MEPA think it is prudent to proceed with construction of a runway into water that flows into a larger body of water without collecting soil samples from the proposed construction site to determine progressive environmental impact to marine life and the quality of soil and cost of disposal or remediation?	See response to comment 217.6.

19 April 1999

LETTER 218

Bob Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Arthur Pugsley, EOEA No. 10458
100 Cambridge Street, Room 2000
Boston, MA 02202

Dear Secretary Durand,

My husband and I have lived in East Boston since 1976. In 1982 when we decided to buy a home here, we called Massport and asked them to outline their long range plans. They had nothing to say about future expansion plans. We also asked them for their best advice on soundproofing as we planned extensive renovation to our home and sought to incorporate soundproofing (at our own expense) into our plans. Massport sent a representative over to find out what we were doing as they had no expertise to offer! As you can see, the decision to live in East Boston was a deliberate one and we did our homework. Why did we decide to make our home in East Boston? It minimized our daily commuting difficulties, it was affordable, its community spirit was heartening. These reasons still stand today.

East Boston is a neighborhood determined to survive and thrive despite the failure of government in the past to protect its residents from harm. It is a black mark on the Commonwealth to this day that a great park - Wood Island Park - was destroyed to build Logan Airport. Talk about environmental injustice! This was not a democratic decision, made in the light of day. The current Massport proposal is of the same ilk. It did not emerge in the light of day. It would not survive a democratic vote, because it is a bad plan, and not just for East Boston. It will choke the city with traffic, it will increase the noise that residents experience, it will negate the progress made in creating more parks and outdoor recreation areas for Boston's families and residents. These harmful results, which cannot be mitigated, were not give serious consideration in Massport's proposal.. 218.1

I attended Boston City Councilor Paul Scapicchio's hearing on March 2 and both MEPA hearings on April 6 and April 7. The arguments against Massport's plan were well stated at these public meetings and I will not restate them here. The executive summary of the CAC's report details the problems and the deficiencies of Massport's proposal. It is clear that Massport's proposal exacerbates the environmental problems we city dwellers already have.

I would like to comment on the arguments I heard from those business interests that spoke in favor of the proposal. In every case the proponents were talking about benefits to people who are in Boston only for a short time - a business traveler, a tourist, perhaps a person who works in Boston, but does not live here. As old as I am, I was still astounded at the willingness of the proponents to sacrifice the well-being of the residents of Greater Boston for "jobs" as Paul Guzzi did or "tourists and conventioneers" as Gloria Larson did. Putting that aside, I tried to look at the business sense of it. Where would the businesses that operate in Boston have their work force live? It is counterproductive to force employees to live farther and farther away from their place of work. The daily commuting problems are already horrendous. Without the investment in regional ground transportation, getting to work will be even worse, if that can be imagined, than it is now. Massport's proposal does not take these factors into consideration either. 218.2

By denying Massport's proposal, you will be protecting the residents of Greater Boston from environmental harm, you will be encouraging a more thoughtful, long-range solution to our transportation needs, and you will prevent further wasteful expenditure of public moneys on this ill-conceived proposal. As citizens, taxpayers, voters and home owners in East Boston, my husband and I hope you will make a decision that will truly be in the interest of the Commonwealth and deny Massport's DEIS/EIR #10458. Surely, what is good for the one and a half million residents of the Boston metropolitan area will be for the good of the Commonwealth as well.

Sincerely,

Carolyn Banulis
33 Morris Street
East Boston. MA 02128

Brent Banulis

Letter 218
Carolyn and Brent Banulis
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
218.1	General Opposition		...The current Massport proposal...will choke the city with traffic, it will increase the noise that residents experience, it will negate the progress made in creating more parks and outdoor recreation areas for Boston's families and residents. These harmful results, which cannot be mitigated, were not given serious consideration in Massport's proposal.	Comment noted.
218.2	General Opposition		...Without the investment in regional ground transportation, getting to work will be even worse, if that can be imagined, than it is now. Massport's decision does not take these factors into consideration either.	Section 2.3 of the Supplemental DEIS/FEIR discusses the specific role played by the regional alternatives and steps Massport has taken to foster increased use of these alternatives. Massport has long recognized and been a proponent of options to Logan Airport. In the Airside Project Draft EIS/EIR, Massport identified up to 7.3 million passengers that could be accommodated by regional alternatives that include use of T.F. Green/Providence, Manchester, and Worcester Regional airports, as well as the introduction of high-speed rail to New York in December 2000. In the Supplemental DEIS/FEIR, Massport undertook analysis of the passenger traffic development patterns at Logan Airport and the regional airports. Based on this analysis, Massport estimates that Logan Airport may only achieve approximately 34 million passengers by 2010 instead of the previously forecasted 37.5 million passengers. The updated forecast reflects the attractiveness of the regional airports and the availability of high-speed rail to New York, Boston's largest air travel market.

April 8, 1999

LETTER 219

Robert Durand
Massachusetts Environmental Policy Agency
100 Cambridge Street, Suite 2000
Boston, MA 02202

Dear Mr. Durand,

Re: EOA 10458

The purpose of this letter is to outline for you my reasons for being in strong opposition to the Massachusetts Port Authority's proposed new runway, otherwise known as Runway 14/32, the proposed centerfield taxiway, and the proposed reduced minimums for deciding whether to abort a landing near my home.

The existing court-ordered injunction against the runway serves to protect the environmental interests of East Boston residents and should not be overturned. The reasoning behind the injunction remains sound: our community should not be asked to absorb additional negative environmental burdens, without all other alternatives having been studied and serious implementation of all alternatives attempted.

Please do not be swayed by the argument that this runway is needed to help alleviate delays at Logan International Airport for the tourist industry or for business travelers coming to Boston. By Massport's own figures, fully 57% of all passengers arriving at Logan or departing Logan are residents of communities located west of Routes I-95 and I-495. Clearly the logic of siting another airport nearer to those residences cannot be denied. Such a new airport would serve to enhance the justice of not allowing more negative burdens here in Boston and would bring those passengers closer to their homes. 219.1

I would also ask that you consider the impact the airport currently has on the health of residents of East Boston. Our children's overall well being is compromised daily by the negative effects of the pollution created by the airplanes and the attendant traffic going to and from Logan. That includes cars, taxis, limousines, and cargo trucks. The infrastructure of our community cannot withstand additional burdens, which would be evident if Runway 14/32 is built. 219.2

Massport's presentations have alluded to the 5000-foot runway as being primarily for commuter planes and being necessary because of the wind patterns here in Boston. Well, a runway a mere 280 feet short of a mile, accommodating 100-passenger jets, creates an unfair environmental burden on East Boston. With careful planning, another airport could be designed with a runway configuration that would take into account all possible wind patterns and the problem would not be duplicated. 219.3

I live in the Bayswater section of Orient Heights. The proposed centerfield-taxiway will only serve to burden further our area with airplane-related pollution as more and more planes are allowed to fill that taxiway. Similarly, I am against zero-visibility landings using Runway 22L—also very near to my home—because if a pilot decides to abort a landing, he/she will accelerate the plane's engines over the water near to Bayswater Street, causing further concussions to the homes in the adjacent area. Massport has shown that body of water to be Boston Harbor, when, in fact, it is the bay near our homes. 219.4

For the health of all persons in East Boston, who are trying to live a somewhat reasonable quality life, and who should not be considered expendable to satisfy the needs of the travelling public, I ask that your agency deny Massport's request to sanction Runway 14/32. This is issue has clear environmental justice implications and your decision must be based on that consideration. 219.5

Thank you for taking the time to consider my concerns, and those of other residents, as you begin to make your decision about this proposal.

Sincerely,

Mary C. Berninger

Mary C. Berninger
156 Saint Andrew Road
East Boston, Massachusetts 02128
617-569-3643

Letter 219
Mary C. Berninger
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
219.1	Regional Transportation	Regional Airports	Please do not be swayed by the argument that this runway is needed to help alleviate delays at Logan International Airport for the tourist industry or for business travelers coming to Boston. By Massport's own figures, fully 57% of all passengers arriving at Logan or departing Logan are residents of communities located west of Routes I-95 and I-495. Clearly the logic of siting another airport nearer to those residences cannot be denied. Such a new airport would serve to enhance the justice of not allowing more negative burdens here in Boston and would bring those passengers closer to their homes.	Massport considers Logan Airport to be part of a regional system of airports that includes the Providence, Manchester and Worcester Regional airports. Service developments and increased traffic at these airports are an important component of the region's long-term strategy to accommodate passengers and activity growth. By its agreement to assume operational responsibility and the eventual ownership of the Worcester facility, Massport is working to increase air services at Worcester Regional Airport and its role in accommodating air travel demand generated in communities west of I-95 and I-495. Greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.
219.2	Public Health	Effects	I would also ask that you consider the impact the airport currently has on the health of residents of East Boston. Our children's overall well being is compromised daily by the negative effects of the pollution created by the airplanes and the attendant traffic going to and from Logan. That includes cars, taxis, limousines, and cargo trucks. The infrastructure of our community cannot withstand additional burdens, which would be evident if Runway 14/32 is built.	The proposed Airside Project will not stimulate additional growth in passenger activity levels at Logan Airport. Off-site motor vehicle emissions estimates are shown in Table 6.4-9 of the Supplemental DEIS/FEIR. Increases in the number of vehicles accessing Logan Airport are not analogous to increases in emissions. As indicated in the table, these emissions generally decrease in the future, as a result of improved motor vehicle emission standards, the increased use of alternative fuels, and other factors. The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative. Massport is separately studying measures for reducing Logan Airport's contribution to air emissions in the region, in the *Logan Airport 1999 ESPR* (previously GEIR). Consideration is given to all emissions sources, and analysis is conducted for the airport, East Boston and regional study areas. Massport is actively involved in many air quality initiatives and explored other options to reduce emissions from activities at Logan Airport in the *Logan Airport 1999 ESPR* (previously GEIR).
219.3	Regional Transportation	Regional Airports	...a runway a mere 280 feet short of a mile, accommodating 100-passenger jets, creates an unfair environmental burden on East Boston. With careful planning, another airport could be designed with a runway configuration that would take into account all possible wind patterns and the problem would not be duplicated.	Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Hanscom Field's potential service area overlaps with the service areas for several airports that already have the necessary infrastructure for commercial service. These airports are the Hanscom Field, T.F. Green/Providence, and Worcester Regional, all which have had or are undergoing major improvements to their terminal buildings, other landside facilities and airfields.

Code	Topic 1	Topic 2	Comment	Response
219.4	Alternatives	Reduced Approach Minima	I am against zero-visibility landings using Runway 22L--also very near to my home--because if a pilot decides to abort a landing, he/she will accelerate the planes' engines over the water near to Bayswater Street, causing further concussions to the homes in the adjacent area.	Zero visibility landings (i.e. Category III Approach minimums) are not proposed for Runway 22L. The minimums on Runway 22L will be reduced to Category I standards consistent with the equipment already installed. Aircraft will still follow the same arrival paths, at the same altitudes as today, but the location at which a missed approach procedure will be initiated will be moved closer to the airport. Since missed approaches rarely occur, they have no discernible effect on the cumulative noise such as the Day-Night Sound Level (DNL), but are rather single aircraft events. The noise from a missed approach is at maximum value just after engine thrust has been increased for the climb-out. For example, reducing the Runway 22L decision height to 200 feet moves this maximum noise point to approximately 3,000 feet from touchdown and further from populated areas in East Boston than is currently the case. Although normally categorically excluded from the NEPA review, the Airside Project study included modeling of changes in runway availability due to reductions in the approach minimums and an analysis of the potential impacts on community noise exposure that may result.
219.5	General Opposition		For the health of all persons in East Boston, who are trying to live a somewhat reasonable quality life, and who should not be considered expendable to satisfy the needs of the traveling public, I ask that your agency deny Massport's request to sanction Runway 14/32. This issue has clear environmental justice implications and your decision must be based on that consideration.	Refer to Section 6.8 of the Supplemental DEIS/FEIR for a discussion of the Environmental Justice analysis. Noise was found to be the only adverse impact from the Preferred Alternative with the potential for Environmental Justice impacts. Additional demographic analysis of the noise-affected areas was conducted to determine if minority and/or low-income populations would be disproportionately affected by the Preferred Alternative. This analysis found that there is no high and adverse disproportionate impact caused by the Preferred Alternative.

COMMENT PROCEDURE for: Draft Logan Airside Improvements (a.k.a. Runway 14/32) **EOEA #10458**

All comments on EIRs (environmental impact report) must refer to the EOEA file number. There may be other identifying numbers, but the EOEA file number is the one which must be used.

LETTER 220

Comments not referring to the EOEA file number may not be considered.

All comments must be received April 22, 1999
All mail concerning the environmental impact review process including filings, comments, and all associated materials must be addressed to:

Bob Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Arthur Pugsley EOEA No. **#10458**
100 Cambridge Street - 20th Floor
Boston, MA 02202

Dear Mr. Durand,

My comments to the EIR-Logan Airside Improvements Plan EOEA #10458 are as follows:

There are toxic fumes in the air and I am breathing into my lungs. I do definitely hope you take some severe disciplinary action against the people who want to expand the runway. "The Blute Crew" we dub these people - Only because they think runway expansion is a good idea. Please take action immediately so my reputation and health are not laying waste. 220.1

Name Christopher Blackler
Address 2 Webster Ave.
E. Boston, MA 02128
Phone 569 - 3296

Letter 220
Christopher Blackler
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
220.1	Air Quality	NAAQS	There are toxic fumes in the air and I am breathing [them] into my lungs.	Dispersion modeling indicates no violation of the NAAQS, which were designed to protect human health and welfare.

LETTER 221

Bcc:
From: Catherine Brayden@fld_op_Boston@OFC
ject: Logan Airport
e: Wednesday, April 21, 1999 14:39:37 EDT
tach:
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

It is difficult to express my tremendous concern about Massport Authority's plan to expand airport transportation through the building of runway 14/32 a second taxiway, and lower ceiling height for landing aircraft at Logan.

As a lifelong resident of East Boston, it does not seem possible that a community with limited resources can successfully win an argument against this expansion. The Massport Authority can send representatives to the Greater Boston Chamber of Commerce and other businesses to argue their mutual need. Massport has the capital to invest in subliminal TV ads on the CNBC and local broadcast networks. Therefore, it becomes incumbent upon your agency to represent the citizen of Boston in its review of Massport's plans for Logan Airport.

Commonwealth of Massachusetts participates in the air ansportation provided at Logan - not just East Boston and its surrounding communities. It is a compliment to believe that all travels through Logan are coming to Boston; but common sense says that is not true. The 128 and 495 beltways present evidence of the expansion of business outside the Boston area. These businesses and communities are best served by a second airport. 221.1

As Massport presented to this community, the airport is good for economic development. A second airport has the potential to employ up to 15,000 people, to hook up to high speed rail, and improved infrastructure of the host community. Travelers would be 30 to 45 minutes closer to home or their business destinations.

A second airport would not deny the Boston businesses and tourist the availability of air transportation. A second airport would offer choices to travelers, offer better air and ground transportation while in Boston, and reduce travel time for those traveling outside the Boston area.

Logan Airport has reached its capacity; a sixth runway is not the solution.

An afternoon at Constitution beach in East Boston will provide u with clear visual and audible reasons why a second taxiway is nful to our environment. The jet noise, rumbling and exhaust umes have a negative impact on the residents of Orient Heights and beach goers alike. To add a second taxiway, center field or 221.2

not, will not increase the benefits to this community.

It is almost impossible to believe that your organization would approve of lowering the ceiling on landing heights. It is already possible to see the passengers on the planes as the fly :r East Boston and Winthrop to land at Logan.

Massport has not met its obligation to develop an air and ground transportation system that meet the needs of the Commonwealth of Massachusetts. It has placed all the responsibility on a small island called East Boston and the impact has affected the quality of life of all Bostonians and neighboring communities near and far. 221.3

With all due respect, I request that you deny the request for addition environmental damages; deny Massport Authority's request to lift the injunction; and deny the development of runway 14/32, a center field taxiway and lower landing heights.

Thank you for your time and consideration of this important issue.

Catherine Brayden
351 Sumner Street
East Boston 02128
617-567-0419

Letter 221
Catherine Brayden
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
221.1	Regional Transportation	Regional Airports	...The 128 and 495 beltways present evidence of the expansion of business outside the Boston area. These businesses and communities are best served by a second airport...A second airport has the potential to employ up to 15,000 people, to hook up to high speed rail, and improved infrastructure of the host community. Travelers would be 30 to 45 minutes closer to home or their business destinations. A second airport would not deny the Boston businesses and tourists the availability of air transportation. A second airport would offer choices to travelers, offer better air and ground transportation while in Boston, and reduce travel time for those traveling outside the Boston area.	Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Hanscom Field's potential service area overlaps with the service areas for several airports that already have the necessary infrastructure for commercial service. These airports are the Hanscom Field, T.F. Green/Providence, and Worcester Regional, all which have had or are undergoing major improvements to their terminal buildings, other landside facilities and airfields.
221.2	Alternatives	Taxiway Improvements	...The jet noise, rumbling and exhaust does have a negative impact on the residents of Orient Heights and beachgoers alike. To add a second taxiway, center field or not, will not increase the benefits to this community.	Implementation of Runway 14/32 would not result in substantial noise impacts in any community. Rather, it would enable the air traffic controllers to adhere more closely to the PRAS goals and decrease the population that is most severely affected. For example, implementation of the Preferred Alternative will reduce the population affected by Day-Night Sound Level values greater than 70 dB by four percent with the 29 M Low Fleet scenario, by 67 percent with the 37.5 M High Fleet scenario, and by 39 percent with the High Regional Jet Fleet, while increasing the population exposed to Day-Night Sound Level values greater than 65 dB by two percent, zero percent, and three percent for these three fleet scenarios, respectively. Refer to Section 6.2 of the Supplemental DEIS/FEIR and population counts presented in Tables 6.2-3 through 6.2-8 of the Supplemental DEIS/FEIR. The Airside Project leads to a decrease in odor-causing hydrocarbon emissions, when compared to the No Action Alternative. This is illustrated in Table 6.4-7 and Figure 6.4-5 of the Supplemental DEIS/FEIR. However, decreases in odorous emission concentrations will be imperceptible.
221.3	Regional Transportation	Regional Airports	Massport has not met its obligation to develop an air and ground transportation system that meet the needs of the Commonwealth of Massachusetts.	Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 of the Supplemental DEIS/FEIR indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.

LETTER 222

CHARLES I. CANN, III
20 LEVERETT AV., #6B
E. BOSTON MA., 02128
APRIL 11, 1999

DRAFT EIR

ROBERT DURAND, SECRETARY
OF ENVIRONMENTAL AFFAIRS
ATTN MEPA OFFICE
MR. ARTHUR PUGSLEY -
EOEA # 10458

DEAR MR. PUGSLEY,

I'M WRITING YOU TO ASK YOU TO REJECT MASSPORT'S PLANTO BUILD RUNWAY 14/32 - CENTER TAXIWAY. FOR MANY YEARS THE PEOPLE OF EAST BOSTON AND SURROUNDING COMMUNITIES HAVE BEEN PLAGUED WITH NOISE, CONJESTION, AND AIR POLLUTION AS A DIRECT RESULT OF LOGAN AIR PORT.

I LIVE IN THE ORIGNT HEIGHTS/ BEACHMONT SECTION OF EAST BOSTON. A FEW WEEKS AGO, I ATTENDED AN INFORMATIONAL MEETING SPONSORED BY MASSPORT. I ASKED BETTY DESROSIERS WHAT WOULD HAPPEN

IF 14/32 WAS BUILT. I ASKED HER
IF ALL THE SMALLER PLANES WOULD
USE. THE NEW RUNWAY AND SHE
SAID YES, WHICH LED ME TO BELIEVE
THAT ONLY SO-CALLED CLASS 3
AIR PLANES WOULD FLY OVER MY
HOUSE. THE CLASS 3 PLANES, L1011'S
AND 747'S ARE THE ONES THAT
MAKE THE MOST NOISE! YOU
CAN'T SIT ON YOUR PORCH, USE
YOUR YARD OR TALK TO YOUR
NEIGHBORS OUTSIDE WITHOUT SHOUTING
MASSPORT HAS EVEN ADMITTED THAT.
THEIR MONITORING OF NOISE IS 222.1
FLAWED. IN SUMMER THE SMELL
OF JET FUEL IS ALMOST UNBERABLE
EVEN IN WINTER WITH SOUNDPROOF
WINDOWS, THE HUSE STILL SHAKES
AND YOU STILL HEAR THE PLANES
AND SMELL THE JET FUEL.

THEY TELL US THAT THE
CENTER TAXIWAY WILL MEAN 222.2
PLANES WILL BE ABLE TO MOVE
TO AND FROM THE TERMINALS FASTER
SO THERE WILL BE LESS AIR
POLLUTION, BUT IT SEEMS THAT
MORE PLANES MEANS MORE JET
ENJINES RUNNING WHICH SEEMS

222.3 TO ME TO TRANSLATE TO MORE JET FUEL AND MORE NOISE. AND IF THEY LOWER THE MINIMUM HEIGHT, THE PLANES WILL BE FLYING EVEN LOWER OVER MY HOME AND MY NEIGHBORHOOD. A FRIGHTENING THOUGHT INDEED! HOW ENVIRONMENTALLY FRIENDLY MASSPORT IS TO BE WILLING TO SPEND $200,000 TO MOVE AN ENDANGERED BIRD! WE LIVE NEAR THE AIRPORT SO WERE NOT ENTITLED TO HAVE ENDANGERED BIRDS!

ONE DAY LAST WEEK AROUND 7:30 IN THE EVENING I HAD TO WAIT FOR FOUR 18 WHEELERS ON OUR CITY STREETS TO GO TO THE AIRPORT. LAST FRIDAY I HAD TO WIND AROUND TWO SHUTTLE BUSES A STRAIGHT TRUCK AND AN 18 WHEELER AT THE SAME INTERSECTION. WERE INUNDATED WITH AIRPORT TRAFFIC ALL THE TIME ALONG WITH TAXIS, LIMOSINES OIL TRUCKS, SHUTTLE VANS AND GENERAL AIRPORT TRAFFIC.

IN THE MOVIE "FIELD OF DREAMS" THE EXPRESSION WAS.

"IF YOU BUILD IT, THEY WILL COME."
WELL, THEY'RE ALREADY HERE!

I'VE READ LETTERS AN EDITORIALS ABOUT THE PEOPLE SURROUNDING HANSCOM FIELD COMPLAIN ABOUT THREATS ABOUT QUALITY OF LIFE AND HISTORICAL SIGNIFICANCE. WHAT ABOUT OUR QUALITY OF LIFE AND OUR HISTORY?

T. F GREENE AIRPORT AND MANCHESTER AR EXPANDING THEIR OPERATIONS BECAUSE THEY KNOW LOGAN IS TOO SMALL TO HANDLE ANY MORE TRAFFIC. WORCESTER AIRPORT HAS BEEN LOSING BUISNESS BECAUSE OF LACK OF FACILITIES. ONLY RECENTLY HAS MASSPORT BEGUN TO ADDRESS WORCESTER'S POSITION ON A REGIONAL BASIS.

ALL WE EVER HEAR FROM THE BUSNESS PEOPLE AND AIRLINE SPOKESPEOPLE IS HOW GOOD THIS PLAN WILL BE FOR OUR ECONOMY 222.4

WHAT ABOUT THOSE OF US THAT BEAR THE BRUNT OF MASSPORT OPERATIONS? IS ECONOMICS MORE IMPORTANT THAN PEOPLE?

DOES A "MORE EQUITABLE DISTRIBUTION OF NOISE MEAN ONLY THE WORKING CLASS COMMUNITES AROUND LOGAN? DO ENDANGERED BIRDS HAVE MORE OF A CHANCE FOR SURVIVAL THAN ENDANGERED PEOPLE?

I BELIEVE THAT IF THEY COULD, MASSPORT WOULD MOVE US ALL AWAY FROM LOGAN AND TAKE OUR HOMES JUST AS THEY DID TO THE PEOPLE ON NEPTUNE ROAD. NO AMOUNT OF MITIGATION OR STOP-GAP MEASURES CHANGES THE FACT THAT WE NEED A SECOND AIRPORT. 222.5
LOGAN HAS REACHED ITS CAPACITY, AND LONG SINCE PASSED IT

DO PEOPLE NOT GO TO PARIS OR LONDON BECAUSE THEIR AIRPORTS ARE OUTSIDE THE CITY AND MUST BE ACCESSED BY BUSES OR TRAINS? DO PEOPLE NOT GO TO SAN FRANCISCO BECAUSE OF WEATER DELAYS. I DON'T THINK SO.

PLEASE DON'T BE SWAYED BY BIG BUISNESS OR MASSPORT RHETORIC

PLEASE LISTEN TO THE PEOPLE WHOSE LIVES ARE AFFECTED THE

MUST. HOPEFULLY IT'S NOT TOO LATE TO STOP THE MADNESS.

AT LEAST THEY DIDN'T PROMISE THEY'D CHANGE THE WEATHER. WE KNOW THEY COULDN'T KEEP THAT ONE!

SINCERELY

Charles J. Cammett

Letter 222
Charles I. Cann, III
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
222.1	Noise	Monitoring	Massport has even admitted that their monitoring of noise is flawed.	In 1998, differences between measured and modeled noise became even less when Massport upgraded its monitoring system and began to report noise caused only by aircraft -- a metric directly comparable to the DNL exposure levels predicted by the noise model. At sites having exposure levels of 60 dB or more, this improvement to the monitoring system brought measured and modeled DNL values to within 0.2 dB of each other. (Refer to Chapter 6 of the *Logan Airport 1999 Environmental Planning and Status Report*). Massport continues to investigate possible causes for remaining differences (such as from hill effects) but believes the FAA's INM noise model used in the Airside Project noise analyses accurately represents expected noise exposure. Differences between measured and modeled sound levels have been reported in Logan Airport's various GEIRs and Annual Updates for a number of years. Differences at close-in locations were significantly reduced in 1996 through modification of source levels to better account for over-water sound propagation and apparent use of higher engine power settings than are normally assumed in the noise model's database (Refer to Appendix E of the *Logan Airport 1996 Annual Update)*.
222.2	Alternatives	Taxiway Improvements	They tell us that the center taxiway will mean planes will be able to move to and from the terminals faster, so there will be less air pollution. But it seems that more planes means more jet engines running, which seems to me to translate to more jet fuel and more noise.	The emissions inventory and dispersion modeling indicate better air quality conditions with Runway 14/32 and the Centerfield Taxiway than with the No Action Alternative. The Centerfield Taxiway is designed to increase operational efficiency and reduce taxiway delays, but construction of the taxiway will not lead to an increase in operations. None of the proposed airfield improvements will induce demand by new passengers or operations that would otherwise not come to Logan Airport.
222.3	Alternatives	Reduced Approach Minima	And if they lower the minimum height, the planes will be flying even lower over my home and my neighborhood.	Reduced landing minimums provide for a safer approach by providing precision guidance at lower altitudes, and thus a safer approach The reduced landing minimums do not change the approach path nor reduce the clearance between aircraft and the surface. Rather, they shift the location at which a missed approach decision is initiated closer to the airport. For Runways 27 and 22L, the reduced minimums will make the approach procedures flown by pilots more consistent with FAA standards in effect at most other airports. Reduced landing minimums will increase airfield safety by allowing operations more directly into the prevailing wind and will help improve PRAS goal achievement.
222.4	Alternatives	Impacts	All we ever hear from the business people and airline spokespeople is how good this plan will be for our economy. What about those of us that bear the brunt of Massport operations? Is economics more important than people [are]?	Comment noted.

Code	Topic 1	Topic 2	Comment	Response
222.5	Regional Transportation	Regional Airports	No amount of mitigation or stop-gap measures changes the fact that we need a second airport. Logan has reached its capacity, and long since passed it.	Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Hanscom Field's potential service area overlaps with the service areas for several airports that already have the necessary infrastructure for commercial service. These airports are the Hanscom Field, T.F. Green/Providence, and Worcester Regional, all which have had or are undergoing major improvements to their terminal buildings, other landside facilities and airfields. Airport capacity varies according to weather conditions and traffic volume as well as the airfield layout, facilities and equipment such as ILS, and operational procedures such as approach minimums and aircraft separations.

LETTER 223

Mr Durand, Arthur Pugley;

I am writing to let you know I am opposed to the construction of runway 14/32 I honestly do not think it will help the environment of our air + noise. 223.1

I was at the meeting at the Holiday Inn 4-8-99 and it seemed most everyone felt the same way. I hope you will consider a second airport. There were people from several areas at the meeting in opposition to runway 14/32. Thank you for taking the time reading my request. 223.2

Mrs Carmela D'Amore
62 Haynes St
E. Boston MA
02128

Letter 223
Mrs. Carmela D'Amore
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
223.1	General Opposition		I honestly do not think [the construction of Runway 14/32] will help the environment of our air and noise.	Comment noted.
223.2	Regional Transportation	Regional Airports	I hope you will consider a second airport.	A second major airport is not a solution to the current delay and congestion problems at Logan Airport. The Proposed Project to reduce delay and enhance safety at Logan Airport must be implemented in the near term to address current and future operating conditions.

LETTER 224

Attention MEPA Office

=== CALL BACK MESSAGE === Do

Commonwealth of Massachusetts

TO: Bob A. Durand, Secretary
Environmental Affairs
FAX: (617) 727 – 1598 CC Mr. Arthur Pugsley
TEL (617) 727- 9800 x 301 EOEA No. 10458

FROM: EDITH G DE ANGELIS, Life-long resident of the Eagle Hill Neighborhood, East Boston.

Miss Edith G. DeAngelis
288 Meridian
East Boston, MA 02128-1314

PLEASE CALL AT [TEL] 617-567-1442 4/23 → 1st transmission
[FAX] 617-567-1442 2nd transmission 4/25

To: Secretary Durand
From: Edith G DeAngelis
~~Date~~: April 22, 1999
Re: "Logan airside Improvements"

23 pages

I would like to go on record as OPPOSED to the ludicrous, as well as unconscionable Massport Plans for additional expansion of Logan International Airport. The surrounding communities have taken an unfair burden, and decades of negative environmental impacts, demise of quality of life, and degradation of neighborhoods, and the community as a whole as a result of the uncontrolled growth Logan International Airport. Enough is enough!! Our lives are at risk!! 224.1

It is my understanding that the "Planning Project" reports are flawed.

However, I will leave the assessment of the reports to those with the technical expertise to make such evaluation.

Therefore my response will address those issues frequently ignored in the planning process, and, in the "response" to technical reports. Although important, and in some cases critical to the health and safety of human beings, as well as wildlife, to the stability of neighborhoods as well as the survival of viable residential communities, they tend to become low priority items when it comes to competition with business, industry, and, the "almighty dollar".

PART I - Planners, decision makers and funding agencies must be cognizant and practitioners of: 224.1 (cont.)

- Environmental Responsibility
- Environmental Justice
- Methods of improving quality of life of those who live, work and play in East Boston/other communities
- Prevention, not exacerbation, of the degradation/deterioration of neighborhoods contiguous to the airport and/or under the flight patterns.

Who will / must be responsible for Re EOEA 10458
Edith DeAngelis

- danger to life and limb
- degragation of the health of residents?
- deterioration of environment?
- deterioration of quality of life?
- exacerbation of air, water, soil noise and visual pollution?
- the insidious, as well as blatant intrusion and extreme negative impacts: upon the lives of the residents of the contiguous neighborhoo

Part II — Harbor Clean up & Toxic Waste
Loss of incredibly invaluable historic sites and open/green space and parkland, and, 3 harbor islands. (not to mention innumerable homes, businesses streets)
Governor's Island - Fort Warren (the first) Fort Winthrop, a richly historic site which should have preserved as part of the rich heritage of America (such as the 2nd Fort Warren at Castle Island South Boston) was instead, 224.2
bulldozed and filled in, along with Apple Island, Bird Island World War I Memorial Park - Wood Island Park designed by Frederick Law Olmsted,

RE: EOEA 10455
Edith G. DeAngelis

America Park and America Field for airport expansion. To add insult to injury, toxic waste, too contaminated for designated outer harbor foul disposal area was dumped into Governor's Island, despite our efforts to stop such an outrageous proposal!

224.2 (cont.) Despite our grave concerns about the potential consequences, now and for generations to come Massport and the Ma. Highway Department proceeded to dump more hazardous waste in East Boston! Incidentally the largest percentage of 21E sites of Ma. D.E.P. are on Massport property.

224.3 Taxpayers and especially local BWSC rate payers are spending billions of dollars to clean up Boston Harbor.

Questions — What happens to our clean harbor if a contractor accidentally or deliberately breaches the capsule containing the toxic waste??

Re: EOEA 10458
Edith DeAngelis
It was my understanding
that the Capsule would/
never, should never be
breached (for obvious
reasons) What will the
construction of the proposed
224.4 runway do to this so
called/concealed/protected
hazardous waste?
What will happen to
the air the water, the
224.5 soil not only in East
Boston but all along
the waterways? The
disposal sites must not
be tampered with in
any way for any purpose!

Part III - "Law of averages"
As the percentage of flights
increase over our homes,
and communities, we need
to have some questions
224.6 answered! We also must
prevent catastrophic confla-
grations, the potential of
which increases with each
new plane and flight pattern
added to a sky already super
saturated with all types and
sizes of aircraft.

Re: EOEA 10458
Edith G DeAngelis

Questions which require a response
a yearly account of at least the
last five years –

- How many flights leaving Logan have been aborted due to
    - faulty equipment?
    - smoke in the Cockpit or Cabin
- How many "near misses" of planes flying over New England?
- How many flights, not from Logan have had to make emergency landings?
- 224.6 (cont.) How many incidents of unruly passengers in flights over New England?
- How many disabled planes unscheduled on Logans roster have had to land at Logan
- How many planes have gone off the runways?
- How planes approaching or leaving Logan have crashed? (On and around the airport – Bayswater Street Boston Harbor and/or on the runways or perimeter of the airport?
- Can you not believe that, God forbid, one or more communities

Re: EOEA 10458
Edith DeAngelo

Could be totally wiped out if a plane were to crash into any of the jet fuel tanks at the airport, the underground jet fuel and gas lines, with all the oil tanks up and down the Chelsea River in East Boston, Chelsea and Revere? We have no escape since they close off the tunnels during emergency situations.

As the number of flights
224.7 increases, over land or over water, the potential for plane crashes increases significantly. Since many of the flights also circle or continue to fly over Boston Inner Harbor and the Mystic River where natural gas tanks are located and where the huge L.N.G. tankers travel (just clearing the Tobin Bridge) the potential for a regional conflagration increases significantly!!! I understand that if the runway is built, an anticipated number of flights will increase

by 21,000, with a [illegible] greater percentage
over the Eagle Hill Neighborhood –
which is an Historic District
with a number of individual
buildings on Landmark of
the City of Boston listing, and
on the National Register of
Historic Places.

- What is being done to prevent
a potential conflagration?

Part IV – Wildlife –

Despite being an urban community,
East Boston enjoys many
varieties of birds and other
wildlife, some rare species.
Wood Island Bay Marsh, Belle
Isle Marsh Reservation, the
runways and perimeter of
the airport are rich with
opportunities for outdoor
education, recreational
and environmental awareness
224.8 programs. How can we protect
the wildlife? How can we provide
opportunities for Outdoor Education?
What would a new runway do to

our natural environment and rich resources? Of course another fear, as experienced in the past, is the ingestion of birds into the jet motors disabling planes. What happens when we increase flights in and out of Logan, by many thousands

Part V - Infrastructure and Safety Intrusion around in, and through neighborhoods of East Boston and surrounding communities.

The roadway system to and
from the airport is already
woefully inadequate, with stand
still, gridlock traffic frequently
seen not only on the highways
but also on many of our
neighborhood streets (at least
224.9 twice a day) When either one
of the bridges to East Boston/
Chelsea (over the Chelsea River)
are open for ship traffic
not only is traffic at a standstill
for over 1/2 mile, but local
traffic is severely exacerbated
by airport related vans, trucks,

Re: 1d #58
Edith DeAngeli

limos, taxis, busses, etc further
clogging our streets disposing
their litter, in addition to all
the noxious gasses.

- Route 1A must be depressed
from and including the
portals of the tunnels
(to re-connect East Boston
to Bell Circle, Revere);
or, at the very least
to Boardman Street
224.10 East Boston. Without a more
efficient, functional depress
roadway, airport traffic,
including on the airport
roadways will be in
a gridlock almost
continuously, most especially
on high peak hours.
This is a critical need now,
a new runway can only
cause more and greater
224.11 problems!
- a special truck route
should be constructed to
Keep ucks Off our neighborho.

Re: 10458
Estelle DeAngelis

Streets!

- Emergency drills should be
implemented and extend beyond
the airport boundaries, to
224.12 include the most negatively
and, most vulnerable to
Catastrophies: East Boston
Chelsea Revere and
Winthrop (at least) as part
of the emergency "civil
defense" drills.

224.13
- Stronger measures to enforce
"no trucks over 2½ tons"
which blatantly drive on
restricted streets, many
times at excessive speeds.

224.14
- Stronger measures, by Massport,
to prevent airport traffic from
spilling over or using short
cuts, through our neighborhood
streets.

- Massport must agressively
encourage public transportation
224.15 and discourage the use of
private cars to and from the
airport.

Re; EOEA 10458
Edith DeAngelis

- Massport must discourage airport related business and their C.E.O.'s, such as hotels, freight storage warehouses, trucking companies (cargo and small trucks and vans) taxis, rental cars, limo, busses from further encroachment and intrusion into our neighborhoods, as well as, in close proximity to our back and front yards and neighborhoods as a whole! 224.16
- 224.17 Massport must return and develop into a park 4½ acres + replace Annunna Park and Amerina Field.. taken during uncontrolled airport expansion!
- Massport and The F.A.A. must do more to make the airlines more responsive to making their airplanes safer and more quiet! 224.18
- Massport must not build a new runway but m . . . [illegible]

EOEA 10455
Edith G. DeAngelis

safer, more logical methods of addressing their claimed need for a new runway. A second airport is 25 years behind schedule! Any relief of any type (as they, Massport-staff claim), would be like putting a cup of water on a raging forest fire or putting a band aid on cancer. If any relief results, the relief would be extremely inadequate and very limited in scope and in time, and, the runway would be obsolete before built. Then what??

VI Critical Problems - Too many to list.

East Boston has two times
less open/green space, per
224.19 Capita, as the city as a whole.
We desperately need a massive
reforestation of trees and other
Vegetation, for the desperately
needed oxygen for our lungs
and well-being, and to

- - - π 10458

counteract the poisonous fumes and particles from aeroplanes and airport related vehicular traffic.

- If Massport gave, and developed, 1,000 plus acres of parkland for the East Boston Community, it could never replace Frederick Law Olmsted "Wood Island Park," Neptun Road, "America Park" and "America Field"!

224.20
- A new runway, with, a doubling of flights can only exacerbate an alread critical need/problem of our community and surrounding communities.
  - Traffic (to and from airport)
  - Parking
  - Pollution
    air, water soil noise and visual pollution
  - Accidents (Vehicular) within the boundaries East Boston which:
    - increase accident statistics for our community

Durand
EOEA 10458
Edith DeAngelis

- adds more demand on municipal resources
  fire department
  police department
- adds more demand on community resources
- increases the insurance premiums of the residents of East Boston due to airport traveller accidents within our boundaries (another unfair/ unjust burden to the residents of E.B.)
- Many other critical needs and problems, not already addressed, would fill
  224.21 many more pages.
- In summary, our health and safety and our overall quality of life must always be the first and foremost consideration!
- It is a matter of survival.
- Survival of our most valuable asset — our people

- Survival of our Natural Resources
- Survival of our via residential community
- A new runway, or any further expansion of Logan Internationa airport, and/or the increase in cargo or passenger flights can not, will not enhance any of the above critical needs. It can only exacerbate an already critical problem/set of problems we currently face.

VII Flight Patterns

- Current flight patterns are dangerous and noisey. Low flying planes almost take down chimneys and roofs of surrounding homes. Every few seconds our lives are disruptive to conversations, any 224.22

form of communication listening to radio, T.V. and life in general!

One plane (and the incredible noise) ~~as~~ not out of sight when another plane is in view. The sound often deafening I'm sure has caused hearing loss in a lot of people surrounding the airport. Even on Main Street Medford the loud noise and vibrations from planes at 3AM 4:30 AM 6:30 AM (as examples) wake sleeping individuals. When that (those) runway(s) is (are) used the planes never stop! (Except when a deepfreeze) The vibrations, the sound and the odor are relentless! The irony is, that the greatest impact over Eagle Hill, E.B. and, Medford, Ma. is when

Re: EOEA-10458
Edith G DeAngelis

the flights are taking off or landing on the runways over our beloved and irreplaceable, former Wood Island Park! (That really rubs the salt in the wound

- We have already been told by Massport officials, that those runways will be used even more, and if the new runway is built Eagle Hill, the most densely populated neighborhood would receive the greatest negative noise impact with some 21,000 increased flights (as a starter). Those flights will also continue to impact Medford and other communities in or under that flight pattern, as well, and will be totally unbearable if increased! Enough is enough!! Living and life, can be intolerable now because of the overflights traffic, noise and pollution impacts and other related airport activities!

Re: EOEA 10458
Edith DeAngelis

VIII

Airport operations and the proximity to homes and neighborhoods

- Logan International Airport and many of the related business operations; i.e. rental car companies, trucking firms, bus van car and limo pool and many other negative impacts are literally and figuratively next to the home front and backyards of the residents of East Boston. It is time for relief and the return/replacement of ~~D~~ open green space and developed parkland not a further exacerbation of 1300 plus rent a cars and other negative impacts in our backyards! 224.23

- The vibrations, most especially from planes' warming up, taking off and landing, make windows shake, buildings vibrate and human beings tremble, birds take off and domestic animals get stressed out!
- Those folks who advocate for more expansion of the airport activities and facilities should live abutting the airport / or next to taxi/bus pool or rent a car agencies!

Re 'EOEA 10458
Edith G DeAngelis

- The jets taking off blast an intense air stream with heat, dust and noxious gas - fumes (you can taste as well as smell) right into the hom and neighborhoods leavin a black trail in the atmosp Traditionally, the jets approachi the airport would jetison exces fuel over Belle Isle Marsh, Boston Harbor, the Eagle Hill Neighborhood, our homes and our gardens leaving a black trail behind the and contaminating the vegetables and fruit growing in private and community gardens.
- The discharged fuel, fumes, noxious gases, dust and dust thrown into the air by planes, by vehicles (hundreds of thousands) related to airport activities and vehicles using our neighborhood streets to and from the airport leave layers of thick dust on our homes and cars and a greasy film on our windows which can not be removed regardless of what cleaning agency is used!
- Can you imagine what our lungs

Re: 1045-8
Rita G. DeAngelis

"look like?
- Don't try to dry clean clothe
outside on a clothesline

IX Epidemiology Study

- What is happening to our
lungs? to the entire respirator
system? The circulatory
system and, Of ea
vital organs?
- Why does East Boston ha
a high incidence of illne
and death caused by
high blood pressure, hea
attacks, cancer, chronic
lung disease, asthma,
cancer. etc.?

224.24

- What will over 21,000 more
flights and hundreds of
thousands additional vehicle
trips through East Boston
do to our health, safety an
well being???
- a new runway and further
expansion of Logan is Not
ACCEPTABLE, our health and
our lives are at stake!
- What about our peace of mind?
Mental stress? Emotional health?

X Historical Perspective

Re! 1045

Edith G DeAngelis

- "NMB" – "Not in my backyard" syndrome / philosophy – just dun it all in East Boston, but not my backyard!
- approximately twenty or more years ago, it was determined that a second airport was needed, and should have been built at that time.
  - Dover Ma was recommended for the site of the 2nd airpo for obvious reasons, withi 24 hours Dover was take of the table.
  - What was not good for the wealthy, and affluent, and influential residents of Dover is not good for the residents of East Boston!

224.25

- What was bad for East Boston approximately twenty years ago when the runway was proposed, and an injunction was filed and has been in place ever since, is not only bad for East Boston and surrounding communities now, but can only be magnified and exacerbated if a new runway is installed

re: Docket 10458
Edita G DeAngelis

X. Public Relations Blitz – Media

- Ho hum!
- What a waste of money to prepare, broadcast at prime time, and have telephone banks in Texas encouraging people to "vote" to approve the runway. They can only ask questions, the operators can not take your statement or vote to deny a new runway, just "yes" and "no" responses and an approval for the runway. I want to go on record once again as I did over the phone, to deny this proposal

XI. Finally, I would like to commend politicians and all other individuals who recognized the problems and negative impacts that airport expansion and operations have caused this, and other communities, and were brave enough to stand up, and say NO more runways! I am personally grateful for their integrity and courage

Edita G DeAngelis

Letter 224
Miss Edith G. DeAngelis
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
224.1	Environmental Justice	Cumulative Impacts	[Critical issues have been omitted from the planning process including health and safety of the local population and threats to community structure. The decision makers need to consider the environmental justice of expanding Logan and find ways of improving quality of life and protecting the local neighborhoods.]	The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR. Public health status reports were available for the City of Boston; however, comparable public health reports were not available from the Public Health Departments of Chelsea, Revere, and Winthrop. A review of the available information did not indicate any causal relationship based on proximity to the airport, nor did it identify hearing loss as a public health concern. Massport is separately studying measures for reducing Logan Airport's contribution to air emissions in the region, in the *Logan Airport 1999 ESPR* (previously GEIR). Consideration is given to all emissions sources, and analysis is conducted for the airport, East Boston and regional study areas. Low income and minority populations were defined in accordance with Federal Executive Order 12898, the U.S. DOT Final Order, and the Council on Environmental Quality's guidance on environmental justice. In addition, the analysis of low-income populations was expanded to include households at 150 percent of poverty level. The data presented are based on the most recently available census data (1990) using Geographic Information System (GIS) technology to analyze impacts at the most detailed level possible. Refer to Sections 6.8.3 and 6.8.5 of the Supplemental DEIS/FEIR for a discussion of the analytical methodology and results, respectively. Massport is committed to a number of mitigation measures in addition to project-specific mitigation. Refer to Chapter 8 of the Supplemental DEIS/FEIR for a discussion of mitigation measures.
224.2	Open Space/ Parklands	Impacts	[Logan construction has already caused the loss of incredibly invaluable historic sites and harbor islands. The proposed construction and expansion will further jeopardize the harbor that is being cleaned up at cost of "billions of dollars."]	The Preferred Alternative will neither incorporate land from nor affect the normal activity or aesthetic value of a public park, recreation area, wildlife refuge, or historic site. In addition, Massport prepares the *Logan Airport Annual Update* and the *EDRs* as part of the review process for the Logan Airport GEIR/ESPR, which presents a series of status updates on conditions and environmental mitigation initiatives at Logan Airport. Massport has carefully planned the airside improvements to reduce delays and improve efficiency without the need for harbor intrusion. Stormwater management will employ Best Management Practices to minimize potential adverse impacts to harbor water quality. No adverse impacts to the Harbor, the Harbor Islands or the surrounding areas are anticipated from this project.

Code	Topic 1	Topic 2	Comment	Response
224.3	Water Quality	Monitoring	What happens to our clean harbor if a contractor accidentally or deliberately breaches the capsule containing the toxic waste?	No work is proposed in or adjacent to the lined landfill area or other airfield areas where hazardous materials are stored.
224.4	Water Quality	Monitoring	...What will the construction of the proposed runway do to this so-called concealed/protective hazardous waste?	Massport recently completed a soil boring and chemical analytical program along the centerlines of Runway 14/32 and the Centerfield Taxiway. The preliminary soil chemical data indicate that the large majority of soil to be excavated is not regulated soil in that it did not exceed the S-2 Reportable Concentration. Therefore, this excavate may be recycled at in-state or out-of-state lined landfills or used at industrial sites for fill. In accordance with Massport's Soil Management Plan, the excavate will not be used for fill or any other use at environmentally sensitive sites such as near wetlands, playgrounds, water supplies, etc.
224.5	Construction	Mitigation	What will happen to the air, the water, the soil not only in East Boston but all along the waterways? ...	Monitoring of airborne soot levels in the vicinity of Logan Airport have shown that the airport is a very small (less than one percent) contributor to ambient levels. In addition, Nitrogen Oxides emissions associated with the Airside Project are lower, when compared to the No Action Alternative. Construction and operational controls will be implemented to ensure that any potential impacts to natural resources are minimized. In general, these will include a construction soil erosion and sediment control plan, a stormwater management plan and the use of Best Management Practices (BMPs) for daily airfield operations.
224.6	Airport Operations	Safety	As the percentage of flights increase over homes, and communities, we need to have some questions answered! We also must prevent catastrophic conflagrations, the potential of which increases with each new plane and flight pattern added to a sky already supersaturated with all types and sizes of aircraft...[Within the last five years] ■ how many flights leaving Logan have been aborted due to: ■ faulty equipment? ■ smoke in the cockpit or cabin? ■ How many near misses of planes flying over New England? ■ How many flights, not from Logan, have had to make emergency landings? ■ How many incidents of unruly passengers in flight over New England? ■ How many disabled planes unscheduled on Logan's roster have had to land at Logan? ■ How many planes have gone off the runways? ■ How many planes approaching or leaving Logan have crashed?	The goals of the Airside Project are to reduce delay, increase airport efficiency, and reduce negative environmental impacts. The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations. Although safety is the first consideration of any proposed alternative at Logan Airport, this data were not relevant to the Airside Study. However, such questions can be answered by contacting the public affairs offices of the FAA or Massport.
224.7	Airport Operations	Safety	[What measures are being proposed to avoid catastrophes such as air collisions over East Boston or damage to fuel storage facilities near the airport? The increase flights proposed increases the potential for accidents, spills, and further degradation to the local environment.]	The first goal of the FAA and Massport is always to provide safe air transportation. Logan Airport has a tightly controlled system of flight tracks and procedures to prevent aircraft accidents. Runway 14/32 and the other proposed Airside improvements are designed to enhance safety and efficiency of traffic operations in the air and on the ground. The runway will segregate smaller aircraft and reduce congestion during northwest wind conditions, reducing the possibility of mistakes and potential for accidents. The Airside Project will not increase flights at Logan Airport. They do not increase the capacity of the airport, but allow the handle the future traffic with enhanced safety and efficiency.

Letter 224: Miss Edith G. DeAngelis
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
224.8	Ecosystems	Wetlands	...How can we protect the wildlife? How can we provide opportunities for outdoor education? What would a new runway do to our natural environment and rich resources?	The Airfield Improvements that comprise the Preferred Alternative will be constructed within the confines of the existing airfield. Most of the wildlife that occurs on the airfield will continue to do so. For the only state-listed endangered species that occurs on the airfield, Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport from construction of the Centerfield Taxiway. The Airfield Improvements will not affect existing opportunities for outdoor education. Section 6.5 of the Supplemental DEIS/FEIR documents that with the exception of the Sandpiper, the Preferred Alternative will not impact natural resources.
224.9	Ground Transportation	Access to Logan	[There is already insufficient infrastructure to support the existing volume of traffic going to and from the airports. The proposed expansion will increase these problems.]	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Environmental Data Reports (Annual Updates).
224.10	Ground Transportation	Access to Logan	[Route 1A must be depressed to reconnect East Boston with Bell Circle, and something must be done to avoid the constant gridlock that will result from more vehicles approaching Logan.]	The Preferred Alternative is not expected to lead to an increase in passenger demand, and therefore, it will have no effect on congestion or delays on Boston area highways.
224.11	Ground Transportation	Access to Logan	A special truck route should be constructed to keep [traffic] off our neighborhood streets!	The Airside Project does not result in additional demand for ground access services.
224.12	Airport Operations	Safety	[Emergency drills should be conducted and include neighboring towns such as Chelsea, East Boston and Revere.]	The first goal of the FAA and Massport is always to provide safe air transportation. Runway 14/32 and the other proposed Airside improvements are designed to enhance safety and efficiency of traffic operations in the air and on the ground. Massport does conduct periodic emergency drills that involve appropriate personnel of neighboring towns.
224.13	Ground Transportation	Access to Logan	[Stronger enforcement is needed to keep large trucks off those city streets with weight restrictions.]	Comment noted.
224.14	Ground Transportation	Access to Logan	[Stronger measures are needed to keep airport traffic off city streets during busy periods.]	The Airside Project does not result in additional demand for ground access services.
224.15	Ground Transportation	Access to Logan	[Massport must encourage public transportation.]	The *Logan Airport 1999 ESPR* (previously GEIR) reports on Massport's progress on meeting its air passenger goal of 35.2 percent by the time air passenger volumes reach 37.5 million annual passengers. Consideration will be given to ways to enhance transit ridership and use of the Logan Express bus service. In addition, Massport is considering consolidation of car rental facilities, which will facilitate the consolidation of the courtesy vehicles serving the rental car companies.
224.16	Ground Transportation	Access to Logan	[Massport needs to discourage use of local streets as temporary storage for limousines and trucks associated with airport-related businesses.]	Comment noted.
224.17	Open Space/ Parkland	Mitigation	[Massport must return or replace the loss of Amerina Park and Amerina Field lost during uncontrolled airport expansion.]	Comment noted.

Code	Topic 1	Topic 2	Comment	Response
224.18	Noise	Impacts	[Massport and the FAA need to enforce noise standards better and force the airlines to make their planes quieter.]	The noise impact per operation is expected to diminish in the future for several reasons. The two largest airlines at Logan Airport, Delta Air Lines and US Airways are replacing their hushkitted shuttle fleets with full Stage 3 aircraft. US Airways took delivery of Airbus 320 aircraft in the fall of 1999 and Delta Air Lines has ordered Stage 3 Boeing 737-800s for its Boston to New York shuttle operations. By the end of 2000, approximately 24,000 annual operations were replaced by full Stage 3 technology aircraft.
224.19	Open Space/ Parkland	Mitigation	[Massport should provide open space and parkland in East Boston to replace lost parkland from previous Logan expansions.]	The Preferred Alternative will neither incorporate land from nor affect the normal activity or aesthetic value of a public park, recreation area, wildlife refuge, or historic site.
224.20	Alternatives	Runway 14/32	[A new runway can only exacerbate existing problems in the community caused by Logan-related traffic and operations.]	Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent Annual Updates (Environmental Data Reports).
224.21	Public Health	Effects	[The health and safety of the community needs to be the "first and foremost" consideration in discussing plans to expand Logan.]	Massport has provided the City of Boston and public health agencies with air quality and emissions data. In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 *Report to the Mayor, Health of Boston* prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the *Soot Deposition Study* with public health agencies and is cooperating with the Harvard School of Public Health on the *South Boston Particle Source Apportionment Study*. Information on public health issues is provided in Chapter 6 of the Supplemental DEIS/FEIR.
224.22	Alternatives	Other Non-Construction Alternatives	[Existing flight patterns need to be changed to reduce impacts on communities. The noise, odor, vibration and pollution impacts on the community are unbearable and will only get worse.]	The existing flight tracks at Logan Airport have been developed over a long period of time with community consultation and provide the best combination meeting both airport requirements and community needs. The redesign of existing flight tracks was not included as a part of the Airside Project. The only new tracks proposed in the Airside Project Draft EIS/EIR are for Runway 14/32 and are over water.
224.23	Open Space/ Parkland	Mitigation	It is time for relief and the return/replacement of open green space and developed parkland not a further exacerbation of 1,300-plus rent-a-cars and other negative impacts in our backyards.	Comment noted.
224.24	Public Health	Effects	[What are the health effects of all the pollution dumped on East Boston as a result of airport operations?] [Why does East Boston have such high incidence of high blood pressure, cancer, chronic lung disease and asthma?] [What are the increased health impacts associated with the proposed 21,000 flights?]	Massport has provided the City of Boston and public health agencies with air quality and emissions data. In January 1996, Massport reviewed available public health data, including mortality and morbidity from each neighborhood in Boston and cancer incidence data available from the Massachusetts Department of Public Health. These data indicated that causal relationships cannot be determined at this time. A review of the 1999 *Report to the Mayor, Health of Boston* prepared by the Boston Public Health Commission leads to a similar conclusion. In addition, Massport has shared the results of the *Soot Deposition Study* with public health agencies and is cooperating with the Harvard School of Public Health on the *South Boston Particle Source Apportionment Study*. The available public health studies for communities adjacent to Logan Airport were reviewed and are presented in Section 6.8 of the Supplemental DEIS/FEIR.
224.25	Environmental Justice	Demographic Data	[As far back as 20 years ago a second airport was recommended in Dover, Massachusetts. This site was rejected immediately because Dover is a wealthy community, yet East Boston continues to suffer greater pollution and airport expansion.]	A second major airport is not a solution to the current delay and congestion problems at Logan Airport. The Proposed Project to reduce delay and enhance safety at Logan Airport must be implemented in the near term to address current and future operating conditions.

Letter 224: Miss Edith G. DeAngelis
Private Citizens: East Boston

LETTER 225

April 22, 1999

Robert Durand, Secretary
Executive Office of Environmental Affairs
Attention: MEPA Office
Arthur Pugsley EOEA No. #10458
100 Cambridge Street - 20th Floor
Boston, MA 02202

Dear Secretary Durand,

As introduction, be advised that I am a East Boston resident and home owner. My experiences of living with the impact of a local airfield, which has grown to major international air transportation facility, so close to the city, have spanned a generation. With resources and knowledge typically available to one person, this letter will document the past, present, and future empirical environmental impacts exerted by airport operations, as well as the immeasurable impacts of those operations.

While reading the Draft Logan Airside Improvement Plan Environmental Impact Report, EOEA #10458 ("EIS/EIR"), it becomes obvious that a resident, citizen, a local business group or a small activist organization each to their own devices or as a cohesive group, can not begin to participate in a fair process, with the intentions of changing the sponsor's desired result and attain that goal. The resources necessary to adequately address, comment on, disprove or rebut the report details and conclusions, even within the extended time allotted, are far beyond an individual's reach. When the opponent has the process "wired", as appears to be the case in this instance, even a technically based cogent document comment is discounted by reference to a study which may be based on flawed data. The sponsor makes abundant use of consultant reports, the results of which may be forgone conclusions.

Problem

Logan, as configured, is beyond demand capacity both airside and landside. The proponent seeks to address the long range, eastern Massachusetts, all mode transportation demand and capacity problem through the proposals contained within this EIS/EIR.

The problem scope is wider than that which is addressed within the EIS/EIR, however, the proponent seeks to frame the problem as limited in scope, under the banner "Reducing Delays at Logan".

The alternatives are limited in scope to just the Logan airport airside aspects of a region wide transportation issue. Logan airport is overextended, and if the delay figures are to be believed, it can not meet the demand of the next century under any modification proposals.

Root Causes

Within the EIS/EIR limited scope context, the problem root causes are:

#1 **As a coastal airport wind and weather are the most significant factors contributing to delays at Logan.**

#2 **Peak Period demand due to fleet mix and a high level of regional carrier flights operated with smaller aircraft.**

#3 **Demand imposed by airline flight schedules.**

In summary, the proponent's Preferred Alternative 1A package does not eliminate the problem root cause but merely addresses the effects of root cause #1 and #3, both of which are outside the proponents sphere of control. In not seeking a root cause solution, at a different, larger and appropriate geographical setting, thereby ELIMINATING root cause #1 and #3, the proposals will result in a short term reduction of effects. In addition, the Preferred Alternative 1A ignores the only short term remedy, reducing demand administratively through Peak Period Pricing, which would not impose further environmental and safety impacts on and beyond the airside island. 225.1

The Preferred Alternative 1A, if the source data is accurate, predicts reduced delays as the result. Just as the high/low load data may overstate delays in may understate them as well. The Preferred Alternative 1A, short term remedy goal to reduce delays, will not solve the problem root cause and eliminate delays. The Preferred Alternative 1A assumptions also predict minimum or no induced passenger loads resulting from increased operations.

For these reasons Alternative 1 and the Preferred Alternative 1A should be found to be inadequate and only Alternative 3 should be considered a remedy, to effect the stop gap demand reductions the sponsor is seeking.

Data

The data and modeling throughout the EIS/EIR is questionable. The data baseline years used for data classes such as noise contours, delayism, passenger volume and growth, operation volume and growth among others, establishing the base for comparison and projections differ. The sponsor uses 1993 as a base line for aircraft load factors. 1993 was the year during which the loads were very high due mainly higher demand and airline over-scheduling, it is not representative of the modeling succeeding years. Decisions should be delayed until results of the upcoming 1998 GEIR are reviewed to confirm the modeling technique is accurate. Use the most recent data for forward projection and establish 1998 as the base line. 225.2

The sponsor uses an extrapolated trend line through the 1993 baseline year to forecast 1999 & 2010 fleet operation projections. The trend was flat during 1994 - 1997 rather than increasing at the average rate. The load forecasts were developed in 1994 and 1995 and ignore the actual data during the subsequent years.

One example of inaccurate data is the modeling projections use *scheduled operations (515,822)* rather than actual operations during 1993 (493,093) or 3.4% fewer actual operations.

Delayism Modeling

The sponsor relies heavily on the DELAYISM model and algorithms to substantiate the problem. As reported in the 1994/1995 GEIR, the modeling, constants and algorithms used to compose the NEM contours were flawed, but it is that very data which was used at that time to make noise contour projections into 1999, and eliminate homes for mitigation eligibility. (The subsequent annual updates supposedly adjusts the error to compensate for the 3 to 7 db Ldn underestimate of ground roll effects). 225.3

The DELAYISM model must be proven over a considerably longer time period and the model compared to empirical data, before the sponsor is allowed to rely on it to define the problem and be accepted as proof. As likely as the model may overstate delays in may understate delays and the sponsor has overestimated the proposed Alternative effect to solve the delay problem through the next century.

Seat Departure Metric

The proponent makes abundant use of OAG data to frame the delay problem. The problem is measured in terms of operations and operation delays. It further models those operation delays in the context of passenger delays, using a seat departure metric as a passenger delay measurement. The passenger delay is then equated to a cost of delay. 225.3 (cont.)

The seat departure metric is only an accurate measurement, when supported by data indicating the number of seat departures with passengers in them. Without that data, an accurate measurement of passenger delays and cost can not be made. To assume each seat departure delay is a passenger delay, using carrier reported load factors for every operation, severely overstates the cost of delay. The GEIR annual updates revises the reported seat departures, but those adjustments are not used in the EIS/EIR conclusions.

Therefore, the EIS/EIR delay cost foundation, its conclusions, remedies and impacts are not supported by current data and is inadequate.

Runway Length

There is insufficient land area west to east along the 14/32 heading to construct a 5000' runway. The 5000' active runway length plus the FAA standard 1000' runway safety area ("RSA") on each end exceeds the undeveloped land area length. To build, it would impose more impacts than addressed in the EIS/EIR. 225.4

The additional impacts are:

- Option A - Acquiring more land area in addition to the #60-61 cargo buildings, such as the parking area for the Hyatt hotel, to gain length to the west.
- Option B - Filling in the harbor on the east end or building a ramp structure into the harbor to gain length to the east.
- Option C - Compromising FAA safety standards by reducing the RSA to less than 1000' on one or both ends.

In choosing Option C, the EIS/EIR is inadequate in addressing this issue. The examples sited for aircraft incidents and how they relate to runway centerline and reduced RSA are ludicrous. The citing can not be accepted as a tacit FAA approval or likely approval of Option C.

The proponent brought forward the 5000' active runway length in favor of 4500', to accommodate a larger jet fleet using the 32 end for landings. There is insufficient land area to build any more than a 4000' to 4500' runway.

I ask that you find the EIS/EIR inadequate regarding this critical issue with the following remedies:

- At minimum, the proponent must have a final acceptance document, with impact analysis, from the FAA regarding a below minimum RSA waiver, under Option C.
- Absent the FAA approval, the proponent revise the EIS/EIR to demonstrate how the 5000' runway would be accommodated . That modified EIS/EIR, with impacts analysis due to harbor intrusion to the east or land acquisition to the west, be evaluated on its merits.
- The proponent modify the EIS/EIR proposal Alternatives 1 and Preferred Alternative 1A and substitute the build with a 4000' to 4500' runway. That modified EIS/EIR, then must be evaluated as to whether it meets the stated goal of reduced delays.

Regional Agreements

The sponsor has stated; No agreements are in place which would bind either the airport operators or the carriers to induce or encourage operations to and from Worcester, Providence, Manchester or Hanscom. Any shift in passenger demand would occur over a long time period, and would be largely dependent upon air carrier decisions relative to service levels, destinations and fares. In the Preferred Alternative 1A and Alternative 1, the sponsor is highly dependent upon operations moving from Logan to these other airports. The sponsor argues, reduced delays at Logan will encourage travel from the regional airports is specious. Only the No-Action Alternative and Alternative 3 (no-build), as a result of the forecast increased delays, will induce an operation shift to the regional airports. 225.5

The regional passenger load reduction conclusions in Preferred Alternative 1A and Alternative 1, should not be considered a factor in meeting the short term or long term problem root cause solution. With no agreements in place and a build scenario, passenger volume will be induced at Logan. Carriers are not motivated to create regional markets. The predictor of this is 1993, when operation capacity overload was experienced due to over-scheduling. Carriers will maximize operations in the active market up to the operation volume capacity and beyond.

The sponsor indicates demand imposed by airline flight schedules as a potential problem tertiary root cause, and infers it is a situation beyond its control. " If operating conditions change and the environment at Logan becomes more like 1993, then over scheduling may once again become a significant cause of delay at Logan....".

EIS/EIR Scope

Consistently, through the ENF and the EIS/EIR, the sponsor has ignored the mandate for a broad scope EIS/EIR. The sponsor prefers to interpret the Federal and State scoping documents to limit the EIS/EIR scope to only air side improvements. Further improvements to Logan will induce more land side traffic volume and overload the capacity of and already fragile land transportation system.

Even supporters of the Preferred Alternative point to the land side delays as a detractor to using Logan.

The sponsor's Preferred Alternative 1A expansion to reduce delays and provide for more operations, encourages and induces more passenger visits and thereby more land side impacts.
The demand for air travel to, from and through Logan is a function of economic trade forces beyond the sponsor's control.

The sponsor has very limited control over aircraft operations. No restrictions may arbitrarily be put in place to limit who uses the airport and when. Those limitations are beyond the control of the sponsor. The desired effect of reduced delays, if it is accomplished, will be manifested in more induced operations and thereby more land side impact.

There has been an increased number of public parking spaces on site and the relocation of employee parking to Chelsea. This effort is not a mitigation of air quality issues, it merely relocates the emissions to a location outside the scope of the EIR. No EIS/EIR has been done to measure the effects at the off-airport locations.

The EIS/EIR should be judged inadequate until the scope is expanded to consider all concurrent land side projects, and the impacts on the surrounding community. 225.6

Second Airport

This point is not a direct argument to a specific impact within the EIS/EIR, but it addresses the overall limited scope theme the sponsor has chosen. The argument demonstrates the EIS/EIR inadequacy, in not addressing the problem root cause and limiting the EIS/EIR scope.

The long range solution to the delay problem root cause (coastal airfield with insufficient land space) is a second major airport. The proponent, in response to numerous comments to the ENF, contends:

"A second major airport is not a solution to the current delay and congestion at Logan...."

While that response may be accurate, the key word to consider is "current". The proponent implies the Preferred Alternative solution is a short term, stop gap measure, and irresponsibly ignores the regional transportation problem, both airside and land side, that in fact would be solved by a second major airport. 225.7

The statewide evaluation of appropriate airport sites conducted in the early 1990's evaluated approximately 188 potential sites, from which all but one site were found to be inadequate for a second major airport. The one site evaluated as having all the attributes, was Fort Devens in Ayer MA. The proponent has stalled and delayed the long overdue decision to support a second major airport and in the process have lost at least 7 years of development and construction time. The proponent has been irresponsible by allowing the Logan problem to grow to crisis stage, and use its inaction and the crisis as a backdrop to argue for a poorly planned, hastily conceived, short sighted, inadequate, short term solution to an immense problem.

Just as the proponent contends doing an analysis is not a guarantee that action will be taken on a proposal, an analysis of Fort Devens as a site for a second major airport should be done. It is understood that legislative action is required to acquire that or any site but it should not be a barrier to the analysis. The proponent may already have conducted such an analysis, but chose to take the path of least resistance, rather than solve the problem, in pursuing the second airport.

It is incumbent upon the sponsor, under its charter, not encourage operations outside of eastern Massachusetts, along with the growth and revenue, but actively pursue the second Massachusetts airport long term solution. The paradigm, 15 years of planning is too long to wait therefore do not begin the process, is easily overcome by focusing all the Authority's resources to such a plan. There are many knowledigble activists in Boston to aid that effort. 225.8

Hanscom Field is classified by the FAA as a reliever airport, but provides merely general aviation relief. In 1997 Hanscom handled 188,000 operations, 85% of which (160,000) were single engine piston aircraft.

Massport has not demonstrated vision and planning in its utilization of Hanscom to relieve Logan's delay problems. It is beyond its control, ability or desire to develop passenger service at Hanscom. Currently, there are no carriers providing scheduled passenger service to or from Hanscom, regardless of this fact, the sponsor uses Hanscom as a regional capacity reliever in both Preferred Alternative 1A and Alternative 1.

Hanscom AFB even at 1000 acres is sizable. As a property owned by Massport, the eminent domain process is available to expand that land area and truly share airport impacts at a different socio-economic level. However it chooses the more expedient course through Logan expansion, rather than confront the NIMBY opposition at Hanscom or Ft. Devens.

Ceiling Reductions

The proponent again demonstrates irresponsibility bringing forward reduced minima within this EIS/EIR. The DH and DA reductions are in direct conflict with agreements in place with the FAA and the reduction proposal seeks to disregard the process to change them. 225.9

Runways 22L and 27 both use a Category I instrument landing system ("ILS"), with specific ceiling minimums, DH and DA for approach and landing. Due to the unique characteristics of Logan and its proximity to residential areas, the FAA chose, demonstrating good judgment, to retain the existing approach minimums.

Centerfield Taxiway

The taxiway stated intention is to alleviate congestion by moving aircraft to and from the gates more efficiently. It would clearly accomplish that goal by allowing multiple simultaneous runway 4/22 crossings. However due to the close proximity of residents to the northeast runway ends, the prevailing winds when these runways are in use will carry the increased V.O.C., Co, NOx emissions into residential areas, when aircraft are queued on the taxiway. This taxiway, if allowed to queue the maximum aircraft as space permits, would result in more aircraft using the taxiway under power, rather than being at a gate, not under power, waiting to queue.. Clearly, the end result will be cumulatively more noise, NOx and Co emmisions, from those queued aircraft operating under low pressure low power conditions.

What is the limit of planes allowed to queue on this taxiway? The center taxiway without limitations, impacts the environmental air quality in the surrounding residential areas. 225.10

Public Health Assessment

The costs related to early deaths and adverse physical conditions to people living in close proximity to the high noise contours has not been effectively measured. Logan's 225.11

noise effects have been present without mitigation from the time the facility transitioned from propeller and prop-jet aircraft through to stage I & II aircraft.

There is a long range, approximately 10 year, clinical study which began in the 1970's conducted by Dr. Taylor of the East Boston Health Center. The study focused on hyper-tension within the community and causative factors.

The scope of the EIR should be expanded to correlate the results of that study within the context of the earliest noise contours. Additionally, the INM should be used to chronologically reverse model NEM contours using data from specific stage I and stage II aircraft, operational data, the most current ground roll adjustments and other INM inputs which were valid during the period of the hyper-tension study. The data from the hypertension study should be correlated geographically and then overlaid with the modeled contours from that period. It is assumed, and an actual study will reveal, that the incidence of hyper-tension, hearing loss, interrupted sleep patterns, stress, and the inherent ill effects, will geographically coincide with the highest level modeled NEM contours. The evaluation should, at minimum document the incidence of hyper-tension within the 75, 70, 65 and 60 Ldn contours. 225.12

The results will provide data to evaluate the cost of premature death, ill-health, medical treatment, psychological and social dysfunction.

Noise

The noise level from both over flights and especially ground noise from takeoffs is insidious, continuos and far exceeds noise levels applicable under RSIP. The noise levels are so severe they are manifested in both measurable audible levels far exceeding both the RSIP time weighted average threshold and especially the short term excursion limit, and as physical resonant frequency modes matching the structural modes of my home as well as other homes built under the same codes. The noise level and resulting resonant vibration during takeoffs from runway 22 are so high that they fall into the unsafe category for very short time periods under federal OSHA standards for safe working environments, and by inference are unsafe for residential environments. 225.13

In classifying jet operations, Massport classifies Stage 2 aircraft fitted with hush kits as Stage 3 aircraft. Stage 3 aircraft exhibit similar noise and pressure in the <100 hz and "C" weighted ranges as Stage 2 aircraft. Any measurements and modeling, for low frequency noise, should assume operations as being Stage 2 aircraft. The 1994/1995 GEIR noise analysis uses only Stage 3 noise data for these fitted aircraft. 225.14

Mitigation is nearly impossible for these low frequencies, and results in resonance effects inducing vibration in the majority of residences, located in the 65 to 75 Ldn contours, built with light weight wall structures.

The noise levels from aircraft is but one intrusion affecting the quality of life in the surrounding communities. There are additional major inconveniences resulting from ground traffic on local streets and highways due to airport related loads, during peak travel periods. Not readily recognized but more intrusive, is commercial vehicular traffic inherently more noise producing than passenger traffic, serving airport support businesses, which occurs during distinctly off peak hours during both the early morning and late evening.

Support

The Preferred Alternative 1A supporters are on record as having a special interest related to their business or their personal wealth. Indeed, they do have a voice in the process which should be heard, but their disregard for environmental impacts and the evaluation bias based strictly on money, must be weighed against the human impacts. As Secretary, I ask that you give greater weight to factors unrelated to business costs. Answer, how much is a life worth? Then answer, how much is a life worth if it were yours or your family? There should not be a distinction. The direct, indirect and cumulative environmental impacts imparted through Logan operations, cost lives which must not be sacrificed for business growth.

The injunction

The sponsor has expended money performing an ENF and an EIS/EIR for approval of a plan which is precluded by a court injunction in place since 1974, prohibiting further airport expansion through added runways. The EIS/EIR adequacy is a prerequisite to arguing for its removal.

The injunction was fought for an won during period in which, political will was the primary vehicle for change. The abutters and the community did not have the current Federal and State Code of Regulations nor the teeth of the present Federal and State Environmental Protection Agencies to provide opposition support. The fact that the injunction has stood the test of time and has been respected by political administrations for nearly a generation, is a testament in itself to the conviction and the wisdom of both political party state leaders. They realized that expansion at Logan was not, is not and will not, solve the root cause of the eastern Massachusetts transportation problems.

The sponsor and its administration demonstrates lack of responsibility and poor judgment, putting forth a stop gap solution to a major problem. It also demonstrates a lack of respect for the community. Yet the sponsor has dragged its feet in its application of mitigation through sound proofing and other means while it is hurtling headlong into a short sighted, ill-conceived expansion plan.

Some of these are emotional type issues, but you must consider what is the correct decision in terms of human factors as well. To the decision makers, it is just a job or a political appointment from which they will succeed to other noble causes. Left in the wake of poor decisions are thousands of people, whose quality of life are irreparably damaged. Step into the shoes of a member of the largely immigrant population, who have inherent socio-economic problems. Walk the walk of the dis-enfranchised, to whom life style choices are limited and are in direct proportion to their near minimum wage, and deciding where to live is a distant option never considered.

These are among the many reasons the EIS/EIR should be found to be in adequate as it is presently composed. A finding of inadequacy will force the debate to consider a eastern Massachusetts transportation long range solution.

Sincerely,

Robert A. DeMayo
125 Ashley St.
Boston, MA 02128
(617) 504-3492
(781) 433- 2438

CC: John C. Silva
Manager, Environmental Programs
Airports Division, ANE - 600
New England Region
12 New England Executive Park
Burlington, MA 01803

Letter 225
Robert A. DeMayo
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
225.1	Regional Transportation	Regional Airports	Within the EIS/EIR limited scope context, the problem root causes are: #1 As a coastal airport, wind and weather are the most significant factors contributing to delays at Logan. #2 Peak period demand due to fleet mix and a high level of regional carrier flights operated with smaller aircraft. #3 Demand imposed by airline flight schedules. ...the proponent's Preferred Alternative 1A package does not eliminate the problem root cause but merely addresses the effects of root cause #1 and #3, both of which are outside the proponent's sphere of control. In not seeking a root cause solution, at a different, larger and appropriate geographical setting, thereby ELIMINATING root cause #1 and #3, the proposals will result in a short-term reduction of effects. ...The Preferred Alternative 1A, short-term remedy goal to reduce delays, will not solve the problem root cause and eliminate delays. ...	The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations. Federal constitutional provisions, federal aviation statutes and regulations, and contractual provisions related to Federal Airport Improvement Program grants prevent Massport from any control over airline rates, routes, and schedules. Congress has specifically forbidden airport operators from exercising any discriminatory action against any class of airport users. Major factors in airline competition are frequency of service and number of markets served, and Massport has no ability to force airlines to consolidate or eliminate flights to influence load factor or aircraft size. Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Hanscom Field's potential service area overlaps with the service areas for several airports that already have the necessary infrastructure for commercial service. These airports are the Hanscom Field, T.F. Green/Providence, and Worcester Regional, all which have had or are undergoing major improvements to their terminal buildings, other landside facilities and airfields. Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.

Code	Topic 1	Topic 2	Comment	Response
225.2	Analysis Assumptions/ Methodologies	Base Year	... The data baseline years used for data classes ... establishing the base for comparison and projections differ. ...	The Supplemental DEIS/FEIR provides updated information for 1998—the latest year for which actual Logan Airport data are available. 1993 was adopted as the base year when the Airside Improvement studies commenced in 1994. The primary function of the Base Year analysis is to calibrate the airfield operation models and environmental impact models. The benefits and impacts of the action alternatives (Alternatives 1, 1A, 2 and 3) are assessed by comparing these not with the base year, but with Alternative 4, the No-Action Alternative.
225.3	Delay	Model	... As reported in the 1994/1995 GEIR, the modeling constants and algorithms used to compose the NEM contours were flawed, but it is that very data which was used at that time to make noise contour projections into 1999, and eliminate homes for mitigation eligibility. ... The DELAYSIM model must be proven over a considerably longer time period and the model compared to empirical data, before the sponsor is allowed to rely on it to define the problem and be accepted as proof. ... The seat departure metric is only an accurate measurement, when supported by data indicating the number of seat departures with passengers in them. Without that data, an accurate measurement of passenger delays and cost cannot be made. ...	Refer to Section 4.4 of the Supplemental DEIS/FEIR for a discussion on the estimation and modeling of flight delays. It includes a description of FAA and U.S. DOT delay measures and their limitations, an explanation of computer models for estimating flight delays, and historical data on delays at Logan Airport and other major United States airports. The methodology used for the Airside Project includes the effects of constraints at Logan Airport, and produces lower delay estimates than FAA modeling. The FAA approved all the models, which have been validated in previously published studies of Logan Airport. The FAA Technical Center was responsible for the capacity and delay results in the 1992 FAA Capacity Enhancement Report for Logan Airport that concluded the need for Runway 14/32,. reduced minimums and taxiway improvements. The Technical Center simulated Logan Airport airfield operations with the RDSIM model and estimated that when activity reached 504,000 annual operations, total delay would exceed 260,000 hours per year. The Airside Project Draft EIS/EIR forecasts delays to increase to 157,500 hours per year when annual operations reach 510,000 with the 29M Low Fleet scenario. The Supplemental DEIS/FEIR compares the FAA Technical Center delay estimates in 1992 with those of the Logan Airside Project estimates. The FAA has concluded that the Airside delays represent "a plausible and conservative estimate...." The FAA consistently rates Logan Airport as one of the most delay prone airports in the United States Logan Airport's estimated annual delay hours are over five times the FAA's 20,000-hour threshold for a severely delayed airport. All models are recognized by the FAA and have been used in prior studies funded by the FAA. The forecasts developed for the future scenarios included estimates of passengers, seats, load factors, and operations, so estimates of the delays to passengers and their associated costs consider the number of seat departures with passengers (the load factor).

Code	Topic 1	Topic 2	Comment	Response
225.4	Alternatives	Runway 14/32	There is insufficient land area west to east along the 14/32 heading to construct a 5,000-foot runway. The 5,000-foot active runway length plus the FAA standard 1,000-foot runway safety area ("RSA") on each end exceeds the undeveloped land area length. To build, it would impose more impacts than addressed in the EIS/EIR.	Runway 14/32 would not impact land areas off of the existing airfield. A Determination of Acceptance of the Level of Safety will be sought from the FAA for the two small, triangular corners of the Runway 32 end RSA and the portion of the RSA south of the runway, which lie over water.
225.5	Regional Transportation	Regional Airports	... The sponsor argues, reduced delays at Logan will encourage travel from the regional airports is specious. Only the No-Action Alternative and Alternative 3 (no-build), as a result of the forecast increased delays, will induce an operation shift to the regional airports. ...With no agreement in place and a build scenario, passenger volume will be induced at Logan. Carriers are not motivated to create regional markets.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.
225.6	Environmental Review Process	FAA/NEPA, MEPA	The EIS/EIR should be judged inadequate until the scope is expanded to consider all concurrent land side projects, and the impacts on the surrounding community [including the potential for increased traffic and air quality impacts in areas currently outside the sponsor's self-determined study area].	The Secretary of Environmental Affairs found that "...the Draft Environmental Impact Report (DEIR) submitted on this project adequately and properly complies with the Massachusetts Environmental Policy Act...". Refer to the Certificate of the Secretary of Environmental Affairs on the DEIR, dated May 7, 1999. The Airside Project has independent utility from existing and proposed landside projects at Logan Airport. The proposed Airside Projects at Logan Airport are designed to improve airport efficiency and better accommodate current and future levels of demand. Long-term growth in air travel demand is a recognized worldwide phenomenon that results from economic and demographic growth. Massport has no control over the underlying determinants of aviation growth. The construction of unidirectional Runway 14/32 would prevent the significant drop in airfield capacity that now occurs during northwest wind conditions. The runway will not increase Logan Airport's normal operating capacity of approximately 120 operations per hour which is available nearly 80 percent of the year. The runway does not induce or stimulate new traffic that would otherwise not occur at Logan Airport. Implementation of the Preferred Alternative would not increase capacity, but rather it would correct a series of deficiencies in the airfield geometry and operation. Massport's plans to handle the ground access requirements of future passenger levels are discussed in the *Logan Airport 1999 ESPR* (previously GEIR) and its subsequent and its subsequent Environmental Data Reports (Annual Updates). No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives.

Code	Topic 1	Topic 2	Comment	Response
225.7	Regional Transportation	Regional Airports	....The proponent implies the Preferred Alternative solution is a short-term, stop gap measure, and irresponsibly ignores the regional transportation problem, both airside and land side, that in fact would be solved by a second major airport.	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase. Because the development of a second major airport would require ten to 15 years for site selection and environmental review, in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years.
225.8	Regional Transportation	Regional Airports	It is incumbent upon the sponsor, under its charter, not encourage operations outside of eastern Massachusetts, along with the growth and revenue, but actively pursue the second Massachusetts airport long term solution.	Because the development of a second major airport would require ten to 15 years for site selection and environmental review in addition to a multi-year construction period, this option is not viewed as a solution to accommodating forecast demand over the next 20 years. Service developments at other surrounding airports, including Manchester, T.F. Green/Providence and Worcester Regional airports, preclude the need for a second major airport.
225.9	Alternatives	Reduced Approach Minima	The proponent again demonstrates irresponsibility bringing forward reduced minima within this EIS/EIR. The DH and DA reductions are in direct conflict with agreements in place with the FAA and the reduction proposal seeks to disregard the process to change them.	The agreement between the City of Boston, the FAA and Massport stipulates that any modification of the existing minimums requires completion of an EIS/EIR, even though the setting of minimums is otherwise categorically excluded from the EIS/EIR process. The reduced minimums will, in fact, enhance safety by providing precision guidance to a point closer to touchdown and reducing reliance on Runway 4R under poor weather conditions, when winds may favor use of an alternate runway.
225.10	Alternatives	Taxiway Improvements	[The proposed taxiway would increase pollutants being blown into residential areas.] What is the limit of planes allowed to queue on this taxiway? The center taxiway, without limitations, impacts the environmental air quality in the surrounding residential areas.	No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives. No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives.

Code	Topic 1	Topic 2	Comment	Response
225.11	Public Health	Effects	The costs related to early deaths and adverse physical conditions to people living in close proximity to the high noise contours has not been effectively measured. ...	Noise was identified as the only off-airport impact associated with the Preferred Alternative (refer to Section 6.2 of the Supplemental DEIS/FEIR for a discussion on noise impacts). Environmental and health studies relating to the City of Chelsea were reviewed to assess the potential for other cumulative or multiple adverse exposures, since the increase in population within the 65 dB DNL contour associated with the Preferred Alternative is primarily within this community. A review of issues within Chelsea indicated a concern regarding toxic discharges associated with industrial facilities, truck emissions, and contamination of Chelsea Creek. There was nothing to suggest that these issues increased the noise impacts associated with the Preferred Alternative. Mitigation of the increased noise within the 65 dB DNL noise contour will be provided to affected communities in the form of residential sound insulation. Refer to Section 6.8 of the Supplemental DEIS/FEIR for additional information.
225.12	Environmental Review Process	MEPA	The scope of the EIR should be expanded to correlate the results of [the "Taylor study of the East Boston Health Center"] study within the context of the earliest noise contours. ...	The Scope of Work for the Supplemental DEIS/ FEIR was defined by the FAA and MEPA following an initial scoping process. A subsequent set of tasks was developed after a follow-up review of the Draft document by the Supplemental DEIS Panel empowered by the FAA to add supplemental information to the Supplemental DEIS. Neither scope included mention of the "Taylor Study".
225.13	Noise	Impacts	...The noise level and resulting resonant vibration during takeoffs from runway 22 are so high that they fall into the unsafe category for very short time periods under federal OSHA standards for safe working environments, and by inference are unsafe for residential environments.	OSHA standards are not applicable to community noise. Nevertheless, the baseline standard for workers is a maximum exposure of 90 dBA *continuously* for 8 hours per day, with higher levels up to 120 dBA permitted over shorter durations. As indicated in the tables of data listing Times-Above-Threshold sound levels (e.g. Table E-4 of the Supplemental DEIS/FEIR showing results for the High Regional Jet scenarios), the highest duration exposure to levels of 85 dBA (5 dB more conservative than OSHA) occur at Site 4 in Winthrop where the total duration of the exposure over a full 24-hour period is only 14.4 minutes. Exposure above 90 dBA OSHA standard is obviously less than that and is well below the allowable 8 continuous hours. The noise levels occurring in even the closest community do not come close to exceeding OSHA standards.
225.14	Noise	Impacts	Mitigation is nearly impossible for these low frequencies [<100 Hz), and results in resonance effects inducing vibration in the majority of residences, located in the 65 to 75 Ldn contours, built with lightweight wall structures.	Neither Massport nor the FAA is aware of any evidence to support the contention that structural damage has ever occurred due to overflights. Noise-induced vibration levels from aircraft, though they may cause rattling, are normally less than footfalls produced by people walking through their own homes.

LETTER 226

Mary Dreitlein
408 Summer Street
East Boston, MA 02128

March 3, 1999

Secretary Robert Durand
c/o MEPA
100 Cambridge Street
Boston, MA 02202

Dear Secretary Durand:

I am writing to express my concerns over Massport's proposed runway 14/32. Logan cannot handle the air traffic growth of the 21st Century. The present noise inside the city has rendered many areas unfit to live in. Logan is calling this new runway a "delay reduction program", call it what you may, it is an expansion of Logan Airport, an expansion of the noise pollution and air pollution, not just from the planes, but from the increased auto traffic, bound to be moving inefficiently to and from Logan.

Logan is here in East Boston, it will not go away, it can serve the city well, but to do so it must reduce it's size. It is beyond capacity now! Another airport is needed. The dollars already spent by Peter Blute to promote this plan could have and should have been spent developing a rapid rail system between Hanscom and Boston. Much of what makes Boston a wonderful city to visit as well as to live in is being damaged by Logan.

226.1 As one that lives close to the airport, not on a flight path, I can tell you that there is still constant noise. If "Massport windows" were installed in every home in Boston that may provide some relief on cold winter days. What of the beautiful spring, summer, and fall days. Are we to sit in a tightly closed home with no fresh air? Is that what life in Boston is to become?

Peter Blute says the increased planes will come with or without the new runway. What would he do if he were the CFO of a hotel? Put beds in the halls, when that was full, tap on the doors of sleeping gusts to tell them they must add a cot or two in their room. Capacity is capacity! If the airport is full, if the "NO VACANCY" sign is on the plans will go elsewhere. Hanscom and T.F. Green are reasonable alternatives. Boston cannot take any increase in air traffic, we must work to reduce the size of Logan so it can serve Boston as it should!

This is a difficult problem at best. The points I have made are but a few, to sight all of the reasons why Logan should reduce it's volume would take more time than is reasonable. Please consider what has been said here. I am only one of the million people that live in and love Boston. Protect the environment of Boston.

Sincerely,

Mary Dreitlein

Ms. Mary Dreitlein

Letter 226
Mary Dreitlein
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
226.1	Regional Transportation	Regional Airports	[Logan is already beyond its operational capacity. Massport should explore Hanscom as an alternative to further expansion at Logan.]	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.

Mary Dreitlein
408 Sumner Street
East Boston, MA 02128

LETTER 227

Mr. Robert Durand
Secretary of the Executive Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

April 11, 1999

Dear Mr. Durand:

Protecting the environment is perhaps the most important job anyone can have. Your organization will soon face a major decision which will effect not just our generation, but many generation in the future. Massport's desire to expand Logan Airport is wrong. It will bring increased pollution to our city. It is time to force Massport to find alternative solutions.

I have attended almost all of the public meetings regarding runway 14/32, and although it has been packaged with the title of "Delay Reduction" even Massport officials admit that it is an expansion of Logan. Those that support this expansion do so in the name of money. They do not speak of the environment, of the increased noise and air pollution. How sad it is to hear Massport even speak of having to move birds to Cape Cod because of the increased noise pollution they will cause, and say it will help the economy.

It is all a balance. Being in the city has it's advantages and it's disadvantages. East Boston has
accepted Logan. We have had to keep a constant watch on them in order to maintain an acceptable quality
of life. Each year the problem has increased. Having an airport right in the heart of the city is an advantage
to everyone. If Logan were down sized to where it was ten years ago everyone would reap benefits. The 227.1
plans would land on time, and the passengers would be able to get from Logan to their final destination,
which I may add is usually the most difficult part of anyone's trip.

Enough has already been pointed out regarding Logan's Environmental Impact Study to be able to
say for sure that it is a flawed document. It is a fact that outdated figures were used. It is a fact that the
FAA modeling was not adhered to. It is a fact that there has been a lack of alternative studies. It is also a 227.2
fact that Massport will not reveal it's ten or fifteen year plan.

When Massport officials speak of the rapid rail system to T. F. Green Airport in Rhode Island, they do not mention the proposed fair for this rail service is twenty-four dollars one way. Nor do the discuss the proposed schedule.

There is no reason why Logan can not have a curfew. Other inner city airports do. There is no
reason why Hanscom can not take the small jets, and prop plains, freight should not be going in and out of
Logan. Logan can best serve Boston and the surrounding communities by moving people not freight. 227.3

Several years ago I spent two years in South Dakota working with the Lakota Sioux's. I would like to share some wisdom I learned from the true natives of our country. "When we make a decision we are responsible for seven generations." The effects of your decision will be either the pains or pleasures of the generations to come. Protect our city, protect our air, protect the generations yet to come as well as those of us that are here now. Clean air is more important than money. Please make your decision carefully. It is your job to protect the environment.

Sincerely,

Mary Dreitlein

Letter 227
Mary Dreitlein
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
227.1	Purpose and Need	Airfield Capacity	[Logan is operating beyond its capacity and should be downsized.]	The Preferred Alternative, and specifically unidirectional Runway 14/32, would not increase Logan Airport's normal airfield capacity of approximately 120 operations per hour. This capacity is available at Logan Airport approximately 80 percent of the time. Runway 14/32 would allow Logan Airport to maintain this capacity during periods of strong northwest winds that now require controllers to operate on only one or two runways, compared to the typical three-runway configurations used at Logan Airport. The runway will not increase Logan Airport's normal operating capacity, nor will it encourage or induce an increase in aircraft operations.
227.2	Environmental Review Process	FAA/NEPA, MEPA	[The EIS/EIR used outdated figures to describe existing conditions and project future use.]	In response to the request made by the EPA, as well as by EOEA in its MEPA Certificate on the Draft EIR, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and to provide context to the delay problem at Logan Airport. However, it should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project, is a comparison of the Preferred Alternative to the No Action Alternative, not a comparison of the Preferred Alternative to the base year. A discussion of current and historic conditions can be found in Section 4.2 of the Supplemental DEIS/FEIR. In response to the request made by the EPA, as well as by EOEA in its MEPA Certificate on the Draft EIR, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and to provide context to the delay problem at Logan Airport. However, it should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project, is a comparison of the Preferred Alternative to the No Action Alternative, not a comparison of the Preferred Alternative to the base year.

Code	Topic 1	Topic 2	Comment	Response
227.3	Alternatives	Operational Restrictions	[Logan should have a curfew as other airports do. Freight and small planes should use Hanscom.]	A curfew is considered an airport access restriction. According to the "Noise Act", airport access restrictions are subject to FAA review and require completion of a FAR Part 161 Study. Since the Noise Act was enacted, the FAA has not approved any Part 161 access restrictions proposed by airport operators. Regarding caps on airport operations, federal constitutional provisions (preemption, commerce clauses, equal protection), federal aviation statutes and regulations, and contractual provisions related to covenants in connection with the Federal Airport Improvement Program grants which Massport receives, restrict Massport's ability to control the number of aircraft operations at Logan Airport. In fact, 50 percent of passengers on Logan Airport commuter flights connect to other Logan Airport flights. The Secretary of Environmental Affairs' Certificate on the ENF directed Massport to "discuss [these] off-airport alternatives and analyze the potential each has to divert passengers and/or cargo from … Logan Airport." Cargo operations were not specifically analyzed because they account for only two percent of aircraft activity at Logan Airport and since most all cargo aircraft operate during off-peak hours, cargo operations do not contribute to delays at Logan Airport.

Att: Robert Durand

I'm opposed to
runway 14-32. I have
been a resident of East B
for 64 years & I ha
seen also my husband
airport expansion & he's 7

"Enough is Enough"

Please try to help find an
228.1 alternate solution to this prob
Any source of help would b
greatly appreciated to all a
residents of the surrounding
areas.

Sincerely

Charles & Anna Du

(DULCETTA)

Letter 228
Charles and Ann Dulcetta
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
228.1	Alternatives	Other Non-Construction Alternatives	[Please try to find an alternative solution to an expansion of Logan.]	The improvement concepts evaluated in the Airside Project Analysis evolved from prior studies including the FAA's *Logan Capacity Enhancement Plan* (October 1992); the *Logan Runway Incursion Mitigation Plan/Taxiway Relocation Study* (December 1993); the *Logan Final GEIR* (July 1993); and the *Logan Airside Improvements Feasibility Study, Phase 1 Report*, published in July 1995. The FAA evaluated a numerous physical, operational, and administrative concepts for reducing Logan Airport delays in its *Boston Logan International Airport Capacity Enhancement Plan*. The FAA recommended several improvement concepts, including unidirectional Runway 14/32, for further study. These improvement concepts, as well as concepts from other studies, were individually examined by Massport in the *Logan Airside Feasibility Study*, published in July 1995. Based on the Feasibility study, some concepts were rejected and the most promising concepts were combined into the Alternatives considered in the Airside Project Draft EIS/EIR. The alternatives analysis in the Airside Project Draft EIS/EIR is consistent with state and federal scoping directives for the Airside Project. The results of the Airside analysis indicate that alternatives that include unidirectional Runway 14/32 provide the most benefit in terms of delay reduction and ability to achieve PRAS goals.

LETTER 229

Bcc: Arthur Pugsley@MEPA@EOEA
From: <RFLEMING@WESLEY.IT.EMERSON.EDU>
bject: Runway 14/32 environment impact report
te: Tuesday, April 20, 1999 13:55:44 EDT
tach:
Certify: N
Priority: Normal
Defer until:
Expires:
Forwarded by:

Dear Mr. Pugsley,

I am writing as part of the public comment on the issue of the environmental impact report filed by Massport. I believe that this report is inadequate and should be rejected. The report does not sufficiently address the impact of the new runway on the resident of the surrounding communities. Specifically, it does not address the health effects that increased flights will have on the residents of Eagle Hill neighborhood in East Boston. It also does not address the effect of these increased flights on the real estate value of property in this neighborhood. 229.1 Finally, I believe that the rationale for building a new runway is misleading at worst, of flawed at best. Massport is using skewed figures....the chose 1993 a base year becuase it had the largest number of delays, and they down plat fact that delays have decreased since. 229.2 Also, they have devised their own formula for calculating the number of delays, instead of using the formula established and used by the FAA. Finally, the new runway is only a stop gap measure iimpact on reducing delays will disappear in less than 10 years. 229.3

Again, I urge you to reject this report as inadequate and send Massport back to the drawing board to produce a plan for delay reduction based on a true regional airport system, landings slots and peak hour pricing.

Sincerely,

Robert Fleming
23 Princeton St
E. Boston MA 02128
rfleming@emerson.edu

Letter 229

Robert Fleming

Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
229.1	Public Health	Effects	... The [EIS/EIR] does not sufficiently address the impact of the new runway on the resident of the surrounding communities. Specifically, it does not address the health effects that increased flights will have on the residents [and] the effect of these increased flights on the real estate value of property in this neighborhood. ...	Comment noted.
229.2	Delay	Model	[Massport invented their own method for calculating impacts rather than using the FAA-approved method.]	All models are recognized by the FAA and have been used in prior studies funded by the FAA.
229.3	Alternatives	Runway 14/32	[The new runway is a stop gap measure at best and will only reduce delays for 10 years.]	Based on simulation modeling, Logan Airport experienced 120,000 hours of runway-related delays in 1998. If no actions are taken, runway-related delays are forecast to grow as high as 333,000 hours under a 37.5M High Fleet scenario. The Preferred Alternative produces immediate and long-term benefits by lowering runway delays by 38,000 hours if it had been in place in 1998, and by as much as 94,000 hours in the future 37.5M High Fleet scenario. Because of the impact of the regional alternatives, the 37.5M High Fleet scenario is not expected to be achieved until 2015. The sooner airside efficiencies are implemented; the more benefits will accrue over time. Section 4.6 of the Supplemental DEIS/FEIR shows that delay reduction benefits increase over time as traffic levels increase.

22 April 1999

LETTER 230

Mr. Authur Pugsley - EOEA No. 10458
Massachusetts Environmental Policy Act
Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

John C. Silva, Manager
Environmental Programs
Airports Division, ANE - 600
New England Region
12 New England Executive Park
Burlington, MA 01803

Re: Massachusetts Port Authority (MPA)
Logan Airside Improvements Planning Project ("Project")
Boston-Logan International Airport
Boston/Winthrop

Gentlemen:

I strongly request that the Massachusetts Secretary of Environmental Affairs, Secretary Durand, (the Secretary) and the FAA determine that significant planning deficiencies exist in the DEIS/DEIR of the Logan Airside Improvements Planning Project ("Project") that must be addressed, that the document be found "INADEQUATE" and that a new Draft document be required. Each of the major three parts; the proposed runway 14/32, the centerfield taxiway between the 4/22 runways and, lowering of the minimum have major environmental impacts for the greater Boston metropolitan area which have not been adequately addressed. In addition, the data and studies used are outdated and a 1998 base year should be required with the planning period extended from 2010 to 2020. 230.1

The proposed project is clearly major and complicated, having involving both air side and ground side implications. It is but a segment of a long term airport expansion plan.

I also want to go on record concerning the conflict of interest that exists for the FAA to be a proponent for the Project and then also one of the decision makers in determining the Project's adequacy. I request that the EPA take the lead role for this decision because of the conflict. 230.2

A comprehensive northeast regional transportation plan, including all forms of transportation, should be developed and put in place before any airport expansion is allowed. This should be accomplished with the cooperation of all interested parties, including, but not limited to, residents, businesses, and organizations. It should also analyze all impacts, including airside and landside at airports, track 230.3

adjacent properties for rail, any new planned or proposed marine ferry development or road development. It should explore all environmental impacts on wetlands, waterways, flora, fauna, and human, including health studies as well as air and noise impacts. All impacts in the Northeast must be addressed and a plan developed to determined the least invasive environmental impacts for developments needed to meet not just Massachusetts requirements but the entire North East the region's requirements for future long term growth. This Airside Improvement Study is only one element of the Project and should not be permitted until the landside and regional impacts are included. Segmental planning cannot and should not be tolerated.

The MPA makes the claim in their transmission letter of February 19, 1999 that, "...the lapse of time between the publication of the ENF and the publication of notice availability of this Draft EIR **has no adverse environmental consequences...**" This is blatantly untrue. Weather conditions alone have dramatically changed over the last five years because of the El Nino and La Nina effects. FAA delay data (DELAYSIM) shows that Logan's delay situation has improved since 1993 and is essentially in equilibrium. The entire analysis in the document needs to be updated. 230.4

I urge the Secretary and FAA to require the MPA to change the base year for planning for the project to calendar year 1998, to revise all presentations in the DEIS/DEIR, including the appendices thereto to reflect the changes and to extend the planning period to 2020 from 2010 with concomitant revisions in projected levels of activity and impact and to require that the DEIS/DEIR be republished.

Massport has not met the requirements of the National Environmental Policy Act (40 CFR Part 1502 Environmental Impact Statements) that requires:

1. the DEIS/DEIR to "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated."[1]

   I would expect the DEIS/DEIR alternatives to include, but not be limited to, the following:

   a: Development of a new airport,
   b: Consideration of Implementing a High-Density Rule (Slots) 230.5
   c: Consider Implementation of FAR Part 161 regulations to provide aircraft noise and access restrictions for Stage 2 and Stage 3 operations at Logan to provide noise relief to affected communities, and.
   d: A thorough regional transportation plan, including rail, and all environmental impacts.

2. regarding methodology and scientific accuracy, that, "...They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and the sources relied upon for the conclusions in the statement."[2]

   The DEIS/DEIR does not indicate the detailed methodology used to develop the levels of passenger forecasts presented

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[1] Council on Environmental Quality, 40 CFR Part 1502.14(a)

[2] Council on Environmental Quality, 40 CFR Part 1502.24

3. the environmental consequences regarding the following, "The discussion will include the environmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, the relationship of long-term productivity, and any irreversible or irretrievable commitments of resources which would be involved in the proposal should it be implemented. It shall include discussions of: ...(g) Urban quality, historic and cultural resources, and the design of the built environment..."[3]

The DEIS/DEIR discusses the preferred alternatives effect on historic districts but does not comment on the urban quality, or the design of the built environment. Although Peak Hour Pricing in Alternate 1 clearly shows to be the most beneficial for delays and thus, noise reduction, the MPA continues not to consider this alternative except as a future option.

4. "An agency shall commence preparation of an environmental impact statement as close as possible to the time the agency is developing or is presented with a proposal (PP 1508.23) so that preparation can be completed in time for the final statement to be included in any recommendation or report on the proposal. The statement shall be prepared early enough so that it can serve practically as an important contribution to the decisionmaking process and will not be used to rationalize or justify decisions already made." PP 1508.23 describes a proposal as the following: " 'Proposal' exists at the stage in the development of an action when an agency subject to the Act has a goal, is actively preparing to make a decision on one or more alternative means of accomplishing that goal, and the effect can be meaningfully evaluated."[4] 230.5 (cont.)

The ENF Certificate was issued November 22, 1995. The MPA and the FAA have not complied with the required timing of the DEIS/DEIR document. Furthermore, the analysis uses baseline data of 1993 for a document submitted in 1999. Weather, as well as aircraft and major regional infrastructure and developments have occurred to the point where a 1998 base year should be required.

A lack of "reasonable alternatives" exists because of the lack of assessment of either Hanscom (no mention of this Massachusetts Port Authority owned and operated airport in the document) or a second major airport or other, the possible diversion of cargo to another airport, and the documentation of history of PRAS and the problems of implementation. Further, I do not believe that the metropolitan Boston communities cannot continue to absorb the landside growth that would accompany the proposed airside growth at the airport.

I believe there should be a detailed analysis of the causes of the delays in the document which show aircraft mechanical problems, crew caused delay, and weather causes both at Logan and those caused by weather at other airports. The documented analysis is outdated and inadequate. 230.6

Lowering of the minimum on runway 22L is an additional concern, particularly, for the near in neighborhood of the Saratoga Street area of East Boston. Not only does this allow for an increased number of flights to land at Logan Airport, it also will spread the noise from the missed approach aircraft more horizontally thus impacting the neighborhood at the end of runway 22L with increased noise. Nor does it take into account the fact that the noise created by "spooling up" adversely affects neighborhoods far behind the aircraft. Further computer modeling does not present the real life occurrence in the surrounding communities and a more accurate analysis needs to be done. Communities constantly challenge the 65 db contour lines with regards to soundproofing and which does not include air conditioning, but does require that a residence meet current code specifications. This can cause financial stress on the already noise impacted residents. 230.7

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[3] Council on Environmental Quality, 40 CFR Part 1502.16

[4] Council on Environmental Quality, 40 CFR Part 1502.5

The proposed Centerfield taxiway between runways 4L/22R and 4R/22L leads to further increased operations at Logan Airport and increased noise for the close in residents of Winthrop, Revere, and East Boston. This Taxiway will allow for additional queuing of aircraft very close to the surrounding neighborhoods and Constitution Beach, increased operations which will increase noise and further degrade of the quality of life for these residents. 230.8

Boston as an historic city will suffer the brunt of negative impacts from the proposed Project and will lose a quality of life that will never be recaptured! The additional number of flights, as well as increased traffic, that the Project would allow and encourage will do irreparable harm to the historic city of Boston and the greater metropolitan area. Development of high speed rail connections to other airports and the connection of Boston's two rail stations with the North/South Rail Link could help reduce these impacts. Convention locations and tourist destinations are not determined by the accessibility of an airport, rather they are determined by the quality of the experience of the location. No other major city around the world has had loss of tourists or conventions because of the convenience or inconvenience of the locality's airport. For the MPA to claim that the additional runway and centerfield taxiway are needed for the proposed new convention center is nothing more than an exaggeration. Time and again the MPA has claimed the need for the Project for the good of the city of Boston. With the proposed growth for Logan Airport needless adverse impacts will continue to grow over one of the most historic cities in the country Mayor Menio does not agree with the MPA hypothesis and neither do I. 230.9

Massport and the FAA state "when dealing with an existing airport (such as Logan Airport) within an urban setting (such as metropolitan Boston), any change in operating conditions aimed at more equitably distributing noise impacts (here, in accordance with the PRAS goals) may result in some increase in noise at specific historic areas while at the same time decreasing noise at other historic areas."[5] I believe that changes to Logan's operating conditions are not any more important than the cultural, historical and urban quality of life in the metropolitan Boston area.

The state listed endangered upland sandpiper habitat which would be disrupted by Centerfield Taxiway is not adequately addressed and there is no agreement with the Massachusetts Natural Heritage and Endangered Species Program although this has been a known area of concern since 1993. 230.10

A primary concern of mine is for the newly created Boston Harbor Islands National Recreation Area is the proposed construction of runway 14/32 and the resultant 75,000 proposed flights over the newly created Boston Harbor Recreational Area. This impact, one of environmental injustice, would occur to mostly inner city residents who frequent the islands to get away from the noise and hubbub of city life. This is, and should continue to be, a time for them to experience nature, to hear and smell the harbor and study the skies. These sensory experiences would be severely impacted by the exorbitant number of flights over the harbor. I spend a great deal of time in on the harbor and on the islands. Aiplane noise is already an interruption, 75,000 planes a year will be intolerable.

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[5] DEIS/DEIR Section 8.6.1.2 "Assessment of Impact"

Children from school groups, Boy and Girl Scout troops, Inner City Outings groups, and many other groups camp and explore the islands and enjoy learning experiences from the skies to the flora and fauna of the islands to the marine life and water quality. All of this will be degredated by the subject project. 230.11

The roar of the overhead planes will make a camping experience a horror rather than the wonderful enjoyment of sleeping under the stars. The fuel emissions and dumping from the airplane engines will contaminate the islands and the wildlife, not to mention the humans who will be much more exposed by being out of doors rather than at home or work.

In conclusion, I see this proposed Project as the first step in further major development at Logan airport There is also no guarantee of the unidirectional use of the proposed 14/32 runway, and I request that due to the the lack of future plans and analysis for the airport over the next 20 years that the current document be declared inadequate. In addition, the public has not been given fair consideration of the proposed Project. It is merely an interim solution to a much bigger and more complex problem which must be addressed before allowing the project to go forward. Further the projected growth of jet operations is horrifying. Other alternatives must be assessed. The possibility of the "New Large Aircraft" (NLAs)[6] has not been mentioned or addressed and is frightening for those of us who live in such close proximity to the airport.

Because none of the above mentioned impacts has been adequately addressed or, in some cases, even mentioned in the DEIS/DEIR, I am requesting that the Massachusestts Secretary of Environmental Affairs and the FAA determine that significant planning deficiencies exist in the DEIS/DEIR of the Logan Airside Improvements Planning Project ("Project") that must be addressed, that the document be found "INADEQUATE" and that a new Draft document be required

Thank you for this opportunity to comment.

Very truly yours,

Ethan D. Hoag

cc: John Devillars, Director, Regional EPA
Robert Bartonowicy. Regional Director, FAA

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[6] FAA Report DOT/FAA/AR-97/26, "Impact of New Large Aircraft on Airport Design, "March 1998.

[1] Council on Environmental Quality, 40 CFR Part 1502.14(a)
[1] Council on Environmental Quality, 40 CFR Part 1502.24
[1] Council on Environmental Quality, 40 CFR Part 1502.16
[1] Council on Environmental Quality, 40 CFR Part 1502.5
[1] DEIS/DEIS Section 8.6.1.2 “Assessment of Impact”
[1] FAA Report DOT/FAA/AR-97/26, “Impact of New Large Aircraft on Airport Design, “March 1998.

Letter 230
Ethan D. Hoag
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
230.1	Environmental Review Process	MEPA	... Each of the major three parts; the proposed runway 14/32, the centerfield taxiway between the 4/22 runways, and lowering of the minimum have major environmental impacts for the greater Boston metropolitan area which have not been adequately addressed. In addition, the data and studies used are outdated and a 1998 base year should be required with the planning period extended from 2010 to 2020.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the *Logan Airport ESPR* and its updates. The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the *Logan Airport ESPR* and its updates. Reducing the current landing minimums for Runways 15R, 22L, and 27 at Logan Airport will not increase noise levels. Aircraft will follow the same arrival paths, at the same altitudes as today, but the location at which a missed approach decision must be made will be moved closer to the airport. Current traffic trends at Logan Airport and the regional airports indicate that Logan Airport may not reach 29 million passengers, presented in the Airside Project Draft EIS/EIR as a "1999" projection, until 2003. Continued air service expansion at the regional airports and the introduction of high-speed rail to New York in December 2000 is expected to further slow Logan Airport's passenger traffic growth. With these developments, Logan Airport is expected to reach 37.5 million passengers in 2015 rather than 2010, and the 45 million passenger forecasts will not be achieved until 2024. Thus, the planning forecasts that underlie the delays and environmental analyses cover a planning period of at least 20 years. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a complete discussion of the planning forecasts.
230.2	Environmental Review Process	FAANEPA, MEPA	[There is a] conflict of interest that exists for the FAA to be a proponent for the Project and then also one of the decision makers in determining the Project's adequacy. ...	Comment noted.

Code	Topic 1	Topic 2	Comment	Response
230.3	Regional Transportation	Regional Airports	A comprehensive northeast regional transportation plan, including all forms of transportation, should be developed and put in place before any airport expansion is allowed...[This plan would determine] the least invasive environmental impacts and developments needed to meet not just Massachusetts requirements but the entire North East the region's requirements for future long-term growth.	Logan Airport is part of a regional system of airports that includes T.F. Green/Providence, Worcester Regional and Manchester. Massport has long recognized that service development and increased passenger traffic at these airports are an important part of the region's long-term strategy to accommodate passenger and activity growth. Massport has actively encouraged the development of regional airports and full use of other options, including high-speed rail to Logan Airport's largest market, New York. Regional service was examined in Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR. This analysis supports the conclusion greater use of the regional airports will provide passengers within the service area of such airports with a viable alternative to Logan Airport. Since demand within Logan Airport's primary service area will remain strong, the improvements at other regional airports will not eliminate the need for airside projects at Logan Airport.
230.4	Delay	Model	[The DELAYSIM study is outdated, uses incomplete data and needs to be redone, including using 1998 as the base year and project volume to the year 2020.	The projections of future airfield delays at Logan Airport are not based on analysis and modeling of delays which occurred during 1993. The analysis for 1993 was included in the Airside Project Draft EIS/EIR to provide historical perspective to the delay problem at Logan Airport and for use in model calibration. The analysis contained in the Supplemental DEIS/FEIR has been updated to include modeled delay results for 1998 to provide more current context to airfield conditions at Logan Airport. Refer to Section 4.2 of the Supplemental DEIS/FEIR for a description of the delay analysis and discussion of current and future delays at Logan Airport. The DELAYSIM model represents the most precise model developed to date for measuring delay at Logan Airport. FLAPS and DELAYSIM have been discussed in Section 4.4 of the Supplemental DEIS/FEIR. These models were originally developed for Logan Airport under Massport and FAA funding, and have been used in airport planning studies in the United States and internationally.

Code	Topic 1	Topic 2	Comment	Response
230.5	Environmental Review Process	FAA/NEPA	Massport has not met the requirements of the National Environmental Policy Act [by failing to]: … "Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated." "…identify any methodologies used and shall make explicit reference by footnote to the scientific and the sources relied upon for the conclusions in the statement." … "…include the environmental impacts of the alternatives including the proposed action, any adverse environmental effects which cannot be avoided should the proposal be implemented, …" [Prepare an environmental impact report in a timely manner.]	In January 2000, in response to the FAA's review of the Draft EIS, the FAA called for preparation of a Supplemental Draft EIS to address specific issues identified by the FAA following input from a SDEIS Panel consisting of six persons.
230.6	Delay	Methodology	…[T]here should be a detailed analysis of the causes of the delays in the document which show aircraft mechanical problems, crew caused delay, and weather causes both at Logan and those caused by weather at other airports. The documented analysis is outdated and inadequate.	Delays occur when wind or weather conditions require the use of configurations with fewer than three active runways, when poor weather requires increased separation distances between aircraft, or when airlines schedule more flights than Logan Airport can handle. The Airside Project addresses delays from constraints at Logan Airport. Section 1.4 and Appendix C of the Supplemental DEIS/FEIR also contains a detailed discussion of the FAA and U.S. DOT delay measures and historical data, along with comparisons of Logan Airport delays within the context of delays at other United States airports.
230.7	Environmental Justice	Impacts	[Lowering the minimum on Runway 22L will adversely effect the adjacent neighborhood. The report fails to consider noise created by aircraft "spooling up".]	The noise model *does* account for the noise at the start of takeoff roll as pilots advance their throttles and begin to accelerate down the runway for takeoff. It also includes a correction for higher than normal thrust observed during the final approach to land as well as a short application of thrust reversers after landing. All three factors effectively account for "spooling up".
230.8	Noise	Impacts	[The proposed taxiway will increase noise in Winthrop, Revere and East Boston.]	In 1998, 77 percent of Logan Airport's jet traffic affected communities to the north and south of the airport—East Boston, Winthrop, Revere, parts of South Boston, Dorchester, Quincy, Milton, and Braintree. Without Runway 14/32, as much as 88 percent of Logan Airport's aircraft operations will overfly these communities when Logan Airport reaches 37.5 million passengers. Construction of Runway 14/32 will allow a more balanced geographic distribution of aircraft operations over populated areas, will increase the number of over-water operations, and will reduce noise exposure for close-in communities. Furthermore, the Supplemental DEIS/FEIR also demonstrates the more equitable balance of noise impacts among communities surrounding Logan Airport that can be achieved with the Preferred Alternative as opposed to the imbalance that occurs today no would occur in the future if no action is taken. PRAS noise goals are based on the fact that DNL levels above 75 dB are considered unacceptable for residential land use and that DNL levels above 70 dB are also excessively high and should be reduced if feasible. PRAS recommendations are thus designed to shift operations off of runways where these high levels still exist – primarily in Winthrop and to the north of Logan Airport in East Boston and Revere.

Code	Topic 1	Topic 2	Comment	Response
230.9	Regional Transportation	Passenger Rail	[Boston will suffer the majority of impacts associated with this project. The increased number of flights will do irreparable harm to the city and the whole metropolitan area. High speed rail connections from Boston to regional airports is a better solution.]	Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.
230.10	Ecosystems	Rare species	[Impacts to the endangered upland sandpiper habitat have not been adequately addressed.]	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport associated with construction of the Centerfield Taxiway. The plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat totaling approximately 150 acres at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far in excess of the 40± acres to be lost at Logan Airport. A Memorandum of Agreement has been signed between Massport and the Massachusetts Army Air National Guard for implementation of the program and long-term maintenance of the area as Upland Sandpiper habitat. Additional details of the Upland Sandpiper mitigation plan are presented in Section 8.5 of the Supplemental DEIS/FEIR.
230.11	Environmental Justice	Impacts	[The increased flights over the Boston Harbor National Recreation Area would mostly affect inner city residents.]	The Boston Harbor Islands, while within the No Action Alternative (Alternative 4) 65 dB Day-Night Sound Level (dB DNL) contour, will have no noise increase with the Preferred Alternative. Refer to Section 6.3.3 of the Supplemental DEIS/FEIR for additional discussion of parklands relative to the Preferred Alternative. Refer to Section 6.8 of the Supplemental DEIS/FEIR for a discussion of the Environmental Justice analysis. Noise was found to be the only adverse impact from the Preferred Alternative with the potential for Environmental Justice impacts. Additional demographic analysis of the noise-affected areas was conducted to determine if minority and/or low-income populations would be disproportionately affected by the Preferred Alternative. This analysis found that there is no high and adverse disproportionate impact caused by the Preferred Alternative.

Letter 230: Ethan D. Hoag
Private Citizens: East Boston

LETTER 231

22 April 1999

Mr. Authur Pugsley - EOEA No. 10458
Massachusetts Environmental Policy Act
Office of Environmental Affairs
100 Cambridge Street, Room 2000
Boston, MA 02202

John C. Silva, Manager
Environmental Programs
Airports Division, ANE - 600
New England Region
12 New England Executive Park
Burlington, MA 01803

Re: Massachusetts Port Authority (MPA)
Logan Airside Improvements Planning Project ("Project")
Boston-Logan International Airport
Boston/Winthrop

Gentlemen:

I strongly request that the Massachusetts Secretary of Environmental Affairs, Secretary Durand, (the Secretary) and the FAA determine that significant planning deficiencies exist in the DEIS/DEIR of the Logan Airside Improvements Planning Project ("Project") that must be addressed, that the document be found "INADEQUATE" and that a new Draft document be required. Each of the major three parts; the proposed runway 14/32, the centerfield taxiway between the 4/22 runways and, lowering of the minimum have major environmental impacts for the greater Boston metropolitan area which have not been adequately addressed. In addition, the data and studies used are outdated and a 1998 base year should be required with the planning period extended from 2010 to 2020. 231.1

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A comprehensive northeast regional transportation plan, including all forms of transportation, should be developed and put in place before any airport expansion is allowed. This should be accomplished with the cooperation of all interested parties, including, but not limited to, residents, businesses, and organizations. It should also analyze all impacts, including airside and landside at airports, track right of ways and adjacent properties for rail, any new planned or proposed road development, and all environmental impacts on wetlands, waterways, flora, fauna, and human, including health studies as well as air and noise impacts. All impacts in the Northeast must be addressed and a plan developed to determined the least invasive environmental impacts for developments needed to meet the region's requirements for future long term growth. This Airside Improvement Study is only one element of the Project and should not be permitted until the landside and regional impacts are included. Segmental planning cannot and should not be tolerated. 231.3

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In conclusion, I see this proposed Project as the first step in further major development at Logan airport There is also no guarantee of the unidirectional use of the proposed 14/32 runway, and I request that due to the the lack of future plans and analysis for the airport over the next 20 years that the current document be declared inadequate. In addition, the public has not been given fair consideration of the proposed Project. It is merely an interim solution to a much bigger and more complex problem which must be addressed before allowing the project to go forward. Further the projected growth of jet operations is horrifying. Other alternatives must be assessed. The possibility of the "New Large Aircraft" (NLAs)[6] has not been mentioned or addressed and is frightening for those of us who live in such close proximity to the airport.

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Thank you for this opportunity to comment.

Very truly yours,

M. Blossom Hoag

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cc: John Devillars, Director, Regional EPA
Robert Bartonowicy, Regional Director, FAA

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[5] DEIS/DEIS Section 8.6.1.2 "Assessment of Impact"

[6] FAA Report DOT/FAA/AR-97/26, "Impact of New Large Aircraft on Airport Design, "March 1998.

Letter 231
M. Blossom Hoag
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
231.1	Environmental Review Process	MEPA	... Each of the major three parts; the proposed runway 14/32, the centerfield taxiway between the 4/22 runways, and lowering of the minimum have major environmental impacts for the greater Boston metropolitan area which have not been adequately addressed. In addition, the data and studies used are outdated and a 1998 base year should be required with the planning period extended from 2010 to 2020.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR analyze the environmental impacts of the Airside Project, consistent with established federal and state scoping directives. Appropriate mitigation associated with the Airside Project has also been established. Massport has programs in place to reduce the environmental impacts associated with Logan Airport as a whole. These initiatives are described in the *Logan Airport ESPR* and its updates. In response to the request made by the EPA, as well as by EOEA in its MEPA Certificate on the Draft EIR, the Supplemental DEIS/FEIR includes delay and environmental analyses for 1998 to reflect current conditions and to provide context to the delay problem at Logan Airport. However, it should be noted that the appropriate comparison for assessing future year conditions and the effectiveness of the Airside Project, is a comparison of the Preferred Alternative to the No Action Alternative, not a comparison of the Preferred Alternative to the base year. A discussion of current and historic conditions can be found in Section 4.2 of the Supplemental DEIS/FEIR. Current traffic trends at Logan Airport, as described in the Supplemental DEIS/FEIR, indicate that the 37.5 million annual air passenger level may not be reached until 2015, and the 45 million passenger level may not occur until 2020 or beyond. The planning horizon considered in the airside analysis therefore extends well beyond 10 years. Chapter 2 of the Supplemental DEIS/FEIR addresses the integration of the Airside Project and regional transportation.
231.2	Environmental Review Process	FAA/NEPA	[There is a] conflict of interest that exists for the FAA to be a proponent for the Project and then also one of the decision makers in determining the Project's adequacy. ...	Comment noted.
231.3	Regional Transportation	Regional Airports	A comprehensive northeast regional transportation plan, including all forms of transportation, should be developed and put in place before any airport expansion is allowed. ...[This plan would determine] the least invasive environmental impacts for developments needed to meet the region's requirements for future long term growth.	The alternative analysis conforms to FAA and MEPA scoping directives. The impact of the regional alternatives has been addressed through the study of a range of forecast activity levels. Refer to Chapter 2 of the Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR for a comprehensive discussion of regional alternatives. Massport advocates increased use of the regional airports and high-speed rail services, in addition to construction of Runway 14/32 and the other airside improvement projects at Logan Airport, as a comprehensive plan for ensuring an efficient and balanced regional transportation system. As the analysis in Chapter 2 indicates, these off-airport alternatives are expected to reduce aircraft traffic growth pressures at Logan Airport, but they will not eliminate airside delays at Logan Airport that occur because of a third operating runway during periods of northwest winds. The Preferred Alternative, which specifically addresses this deficiency, is necessary and provides clear benefits at current aircraft traffic levels. These benefits will only increase in the future, even as developments at the regional airports and high-speed rail to New York act to reduce the rate of future growth at Logan Airport.

Code	Topic 1	Topic 2	Comment	Response
231.4	Ecosystems	Rare Species	The state listed endangered upland sandpiper habitat which would be disrupted by Centerfield Taxiway is not adequately addressed and there is no agreement with the Massachusetts Natural Heritage and Endangered Species Program although this has been a known area of concem since 1993.	Massport has developed a comprehensive on-site and off-site Upland Sandpiper habitat mitigation plan in close coordination with the Massachusetts Natural Heritage and Endangered Species Program (NHESP) for loss of such habitat at Logan Airport associated with construction of the Centerfield Taxiway. The plan strives to enhance protection of remaining Upland Sandpiper habitat at Logan Airport without increasing the aviation safety hazards typically associated with birds or hazards to the birds. Additionally, it is expected that an area of former Upland Sandpiper habitat totaling approximately 150 acres at Camp Edwards on Cape Cod will be restored to grassland habitat by removing woody and shrub vegetation to encourage enhancement of the Upland Sandpiper regional population. This restoration effort provides a unique opportunity to expand grasslands in the Commonwealth far in excess of the 40± acres to be lost at Logan Airport. A Memorandum of Agreement has been signed between Massport and the Massachusetts Army Air National Guard for implementation of the program and long-term maintenance of the area as Upland Sandpiper habitat. Additional details of the Upland Sandpiper mitigation plan are presented in Section 8.5 of the Supplemental DEIS/FEIR.

LETTER 232

Mr. Robert Durand
c/o Mr. Arthur Pugsley
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EOA - 10458

East Boston and surrounding communities deserve environmental justice. Mr. Durand, as head of the Massachusetts Environmental Protection Agency, you must support our efforts to stop the expansion of Logan International Airport. Logan is already too crowded with ground and air transportation. This congested area can not be expected to accept the entire burden for Massachusetts air traffic.

Runway expansion as a solution to Logan's over crowding demonstrates the Massachusetts Port Authority's lack of a progressive agenda. Other major cities have built airports away from the city center and the cities have not suffered. Dulles, Newark, and LaGuardia have not diminished the people entering the New York or Washington area. The continued growth of Logan can not be the answer. A new solution is needed.

Massport's planned growth of Logan is short sighted and based on misrepresentations. Their studies show expansion as a solution. Their studies also show the following:

- As part of the Massport soot study, I was informed that I had brake dust from the cars at the Sumner Tunnel in my backyard. My home is more than 2 miles from the Sumner Tunnel but the rear of my house faces the 4L runway.
- In volume 1 page 2-9, Hanscom is not listed in the map of commercial airports. Massport does not consider this airport commercial, but it should be listed and included in the planning as 57.2% of flight demand is based outside the 128 and 495 area. Before any expansion of Logan is activated, Worcester airport should be brought up to it's full potential. 232.1
- The change in height decision, volume 3 page 4, was based on a graph that shows Saratoga Street as the last street before the water. There are two additional residential streets between Saratoga Street and the water. Bayswater Street and St. Andrew Road were not even considered. 232.2
- In the change in height decision graphs the water between Bayswater Street and the Airport is referred to as Boston Harbor. However, in Massport's Buffer Graph for the Bayswater Street area the above mentioned body of water is referred to as Boston Inner Harbor Tidal basin. Massport changes the name of the area to whatever will suit their objectives best.
- Charts and graphs used by the Massport never show surrounding homes or schools. Accurate information would demonstrate the closeness to thickly settled residential areas. It would also show the fact that if planes abort, the engine thrust would be aiming directly at homes. 232.3
- Massport claims pollution will be less with the centerfield taxiway, when all of the exhausts from planes using this taxiway will be aimed at the Bayswater Street homes. The main objective of the centerfield taxiway is to get the planes away from the gates. 232.4
- Regulations for the November Taxiway have been disregarded. A maximum of five large jet aircrafts are permitted on the taxiway at a time, however there are times when 10 to 15 large jets are lined up. Massports reply to complaints are "*we need to*". Regulations and social responsibility are forgotten for the pursuit of more air movement. 232.5

Massport will do anything to get 14-32 implemented. Currently the amount of money being spent to promote the new runway is absurd. I was shocked to hear Boston Edison is a contributor for the Massport television advertisements. I did not realize public utilities could use money from rate payers to lobby for airport expansion. Local concerned citizens can not compete with the corporate media blitzes. The Massport is also asking employees to support the proposed expansion. Through intimidation many local Massport employees will support the runway.

As shown above the Massport has misrepresented information and disregarded policies. We can not believe 14-32 will be unidirectional or this is all the expansion needed. Money and growth are all Massport is interested in. We need the help of the Massachusetts Environmental Protection Agency to stop Massport. People living in the Boston area should have the same environmental rights as the rest of the state. We have the right to breathe fresh air, enjoy a summer day, be able to smell the flowers, not the fumes and hear birds sing, not airplanes taking off. This can not be accomplished without your help. Please stop Massport's plans for expansion.

Thank you for your help in this very important matter.

Sincerely,

Roberta T. Horn

Roberta T. Horn
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East Boston, Massachusetts 02128

Letter 232
Roberta T. Horn
Private Citizens: East Boston

Code	Topic 1	Topic 2	Comment	Response
232.1	Regional Transportation	Regional Airports	In volume I page 2-9, Hanscom is not listed in the map of commercial airports. Massport does not consider this airport commercial, but it should be listed and included in the planning as 57.2% of flight demand is based outside the 128 and 495 area.	The Airside Project Draft EIS/EIR and the Supplemental DEIS/FEIR specifically considered the role of Hanscom Field in the analysis of regional alternatives. Hanscom Field, which serves as a general aviation reliever airport to Logan Airport, already accommodates a significant number of aircraft operations (183,000 operations in 1998). The Hanscom Field activity includes private, business, charter, and air taxi operations that might otherwise use Logan Airport. Since the Airside Project Draft EIS/EIR was filed, Shuttle America, a newly founded airline, began commercial scheduled operations at Hanscom Field, offering limited turboprop services to short-haul regional markets – Trenton, Buffalo, Hartford (discontinued), Wilmington, Delaware (discontinued), and Greensboro. Shuttle America is also conducting operations between Hanscom and New York LaGuardia Airport. While Massport supports commercial service at Hanscom Field consistent with its established policy (60-seat regulation), it believes that Hanscom Field will maintain its role as a major general aviation reliever, and that its geographic proximity to Logan, Worcester Regional and Manchester airports will prevent its development as a significant commercial airport. Additionally, commuter airlines serving Logan Airport are unlikely to move a significant number of flights from Logan Airport to Hanscom Field, since approximately 50 percent of passengers on Logan Airport's commuter flights connect to other Logan Airport flights. However, any new commercial service initiatives proposed for Hanscom Field shall be reviewed for consistency with the *Hanscom GEIR* (HGEIR), its Annual Updates, and applicable regulatory limitations, and shall be considered by the Hanscom Field Advisory Committee. Refer to Section 2.6 of the Supplemental DEIS/FEIR for a discussion of Hanscom Field. The environmental impacts of commercial services at Hanscom Field are summarized from the HGEIR and appear in Appendix B of the Supplemental DEIS/FEIR.
232.2	Alternatives	Reduced Approach Minima	The change in height decision, volume 3 page 4, was based on a graph that shows Saratoga Street as the last street before the water. There are two additional residential streets between Saratoga Street and the water. Bayswater Street and St. Andrew Road were not even considered.	Graphics have been updated, supplemented and corrected.
232.3	Noise	Studies	Charts and graphs used by the Massport never show surrounding homes or schools. Accurate information would demonstrate the closeness to thickly settled residential areas.	The noise exposure contours and basemaps presented in Chapters 5 and 6 all show residential areas. Additional blow-ups of specific areas depict cultural resources, historic districts, and parklands. Schools are shown in Appendix E of the Supplemental DEIS/FEIR on a basemap with school day noise exposure contours.

Code	Topic 1	Topic 2	Comment	Response
232.4	Alternatives	Taxiway Improvements	Massport claims pollution will be less with the centerfield taxiway, when all of the exhausts from planes using this taxiway will be aimed at the Bayswater Street homes.	No alternatives violate the NAAQS. The Preferred Alternative shows better air quality results than the other alternatives.
232.5	Alternatives	Operational Restrictions	Regulations for the November Taxiway have been disregarded.	The Centerfield Taxiway will provide more flexibility for air traffic controllers to handle ground movements.